

# **PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT ON LIABILITY**

*Alek Schott v. Bexar County, Texas*  
Case No. 5:23-cv-00706-OLG-RBF

## **EXHIBIT 8**

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

ALEK SCHOTT, )  
Plaintiff )  
VS. ) CIVIL ACTION NO. )  
5:23CV-00706-OLG-RBF )  
JOEL BABB, in his )  
individual and official )  
capacity; MARTIN A. )  
MOLINA, III, in his )  
individual and official )  
capacity; JAVIER )  
SALAZAR, in his )  
individual and official )  
capacity; and BEXAR )  
COUNTY, TEXAS )  
Defendants )

ORAL DEPOSITION OF JOE GEREB  
AUGUST 1, 2024  
VOLUME 2

ORAL DEPOSITION OF JOE GEREB, produced as a witness  
at the instance of the Plaintiff and duly sworn, was  
taken in the above styled and numbered cause on  
Thursday, August 1, 2024, from 1:30 p.m. to 4:40 p.m.  
before Janalyn Elkins, CSR, in and for the State of  
Texas, reported by computerized stenotype machine, at  
the offices of Charles S. Frigerio, 111 Soledad, Suite  
465, San Antonio, Texas, pursuant to the Federal Rules  
of Civil Procedure and any provisions stated on the  
record herein.

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1 THE REPORTER: Same orders for everyone for  
2 this depo?

3 MR. FRIGERIO: Yes.

4 MR. ELLSWORTH: Yes.

5 MS. HEBERT: Uh-huh, yes.

6 JOE GEREB,  
7 having been duly sworn, testified as follows:

8 EXAMINATION

9 Q. (BY MS. HEBERT) Good afternoon, Deputy Gereb  
10 still?

11 A. Yes.

12 Q. I'm Christen Hebert. I represent the Plaintiff  
13 Alek Schott in this case. And Deputy Gereb, we  
14 previously met during your first deposition back in  
15 February of 2024. Do you remember that?

16 A. Yes, ma'am.

17 Q. And I went over some of the rules back when we  
18 did your first deposition. But it's been a while, it's  
19 been a few months, so I'm going to do a refresher, if  
20 that's okay?

21 A. Yes.

22 Q. And if these guidelines are confusing at all to  
23 you and you need more information because it's been a  
24 while, just let me know.

25 A. Okay.

1 Q. Okay. We're joined today by my colleague,  
2 Mr. Windham, who also represents Mr. Schott. Mr.  
3 Ellsworth, who you previously met, represents Defendant  
4 Babb, and then we've got the counsel for the county and  
5 Defendant Molina, Mr. Frigerio, Mr. Saenz and  
6 Mr. Frigerio. And then we're also joined by Janalyn,  
7 who's our court reporter. She's going to take down  
8 everything we say today.

9 We're going to do the usual stipulations,  
10 which means that you're here and you're waiving any  
11 objections to your deposition notice, the paper that we  
12 give you. So just by showing up here, you're waiving  
13 any objections to that.

14 Do you understand?

15 A. Yes.

16 Q. And you're waiving any objections to Janalyn's  
17 qualifications to be a court reporter. She's a  
18 qualified court reporter, and she's here to report. Is  
19 that okay?

20 A. Yes.

21 Q. And you understood that you took an oath today.  
22 Same oath that you took back in February 2024; is that  
23 right?

24 A. Yes, ma'am.

25 Q. And you understand that that oath is the same

1 as if you were testifying before a judge?

2 A. Yes, ma'am.

3 Q. Okay. Again, like last time, it's important  
4 that we have a clear record, so that means that I need  
5 to ask clear questions. If you do not understand a  
6 question that I ask, please let me know and I'll work to  
7 rephrase it. Similarly, we need you to give clear  
8 verbal answers. So nodding your head or shaking your  
9 head doesn't work because Janalyn can't capture it. So  
10 try to remember to give a verbal answer and then things  
11 like yeah or uh-huh or huh-uh won't translate very well  
12 on the record, so we need you to say yes or no. Is that  
13 fair?

14 A. Correct. Yes, ma'am.

15 Q. Cool. We're going to look at some documents  
16 today. And just like last time, it's your right to  
17 review the entirety of the document before answering  
18 about it. And if we need to take extra time so that you  
19 can review it, I'm happy to take a break so that you can  
20 look over the document. Also, we may look at some  
21 videos today. I'll queue up to various parts of the  
22 video so we don't have to watch the -- the video in its  
23 entirety because some of them can be quite long.

24 But, again, it's also your right to watch  
25 the entirety of the video. So we can take a pause and

1       you can go watch the video with Mr. Frigerio and you can  
2       also watch the video after this deposition in its  
3       full -- in its full length.

4                       Do you understand?

5               A.   Yes, ma'am.

6               Q.   And I just kind of want to be clear, I'm not  
7       trying to trick you here, I'm just focusing on specific  
8       parts of documents or videos to ask questions about  
9       those parts.   Do you understand?

10              A.   Yes, ma'am.

11              Q.   All right.   Is there any reason why you are not  
12      able to give your full and best testimony today such as  
13      you're taking an impairing medication?

14              A.   No, ma'am.

15              Q.   Did you drink any alcohol today?

16              A.   No, ma'am.

17              Q.   And are you generally clear headed to testify?

18              A.   Yes, ma'am.

19              Q.   Other than speak with Bexar County's attorneys,  
20      Mr. Frigerio and his team, did you talk with anyone else  
21      about your deposition today?

22              A.   No.   I notified Sergeant Gamboa that I did have  
23      the deposition today.   Nothing really about the case.

24              Q.   Sure.

25              A.   Just how I had to be here.   And notifying them



1 I had to be here.

2 Q. And Sergeant Gamboa is your current supervisor?

3 A. Yes, ma'am.

4 Q. Okay. Did you review any documents for today?

5 A. No, ma'am.

6 Q. Did you review any videos for today?

7 A. No, ma'am.

8 Q. Okay. Any other materials that you -- you

9 reviewed as part of preparing for this deposition?

10 A. No, ma'am.

11 Q. Okay. Did you bring any documents with you  
12 today?

13 A. No, ma'am.

14 Q. Did you bring your cell phone with you today?

15 A. It's in the office, yes.

16 Q. Okay. It's in Mr. Frigerio's office?

17 A. Yeah.

18 Q. Did you bring your personal cell phone?

19 A. Both.

20 Q. And your county cell phone?

21 A. Yes.

22 Q. Okay. So both your personal cell phone and  
23 your county cell phone are here today?

24 A. Yes, ma'am.

25 Q. Okay. Like last time, we're going to talk a

1 lot about the Bexar County Sheriff's Office. If I use  
2 the term "sheriff's office," can we agree that I'm  
3 referring to the Bexar County Sheriff's Office?

4 A. Yes, ma'am.

5 Q. And if we use the term "the sheriff", can we  
6 agree we're referring to Sheriff Salazar?

7 A. Yes, ma'am.

8 Q. And when -- if we use the term "the county",  
9 can we agree we're referring to Bexar County?

10 A. Yes, ma'am.

11 Q. Okay. I would like to start by looking at  
12 Exhibit H.

13 MR. WINDHAM: Do you know what number we  
14 are on?

15 THE REPORTER: We are on 84.

16 MR. WINDHAM: This will be 84.

17 MS. HEBERT: Thank you.

18 (Exhibit No. 84 was marked.)

19 Q. (BY MS. HEBERT) My colleague has handed you  
20 what has been marked as Exhibit 84.

21 A. Okay.

22 Q. I'm going to get Mr. Frigerio a copy.

23 Can you review this document, take a look  
24 at it?

25 A. This is my 201 file.

1 Q. Oh, okay. So can you tell me what this  
2 document is?

3 A. Still going through it, but it appears it might  
4 be my 201 file. It looks like my -- a lot of this stuff  
5 I haven't seen.

6 Q. And it is my understanding that it is your 201  
7 file.

8 A. It looks like my -- yeah, 201 file.

9 Q. Okay. Can we start by looking at BC 6177? And  
10 those are the numbers at the bottom of the page.

11 A. Okay.

12 Q. Can you tell me what this document BCM 6177 is?

13 A. It's a -- basically an order to report to  
14 Sergeant Gamboa. It's basically transfer orders.

15 Q. Transfer orders?

16 A. From -- from the time I was a patrolman back to  
17 Sergeant Gamboa for the assignment I was given.

18 Q. And I see the date on this is April 30th, 2021;  
19 is that right?

20 A. Yes.

21 Q. Can you look at the next page, too? BC 6178.

22 A. Okay.

23 Q. What is this document?

24 A. Basically the same thing. To sort of report to  
25 Gamboa.

1 Q. And I see the date on this document is  
2 July 8th, 2020; is that right?

3 A. Yes, ma'am.

4 Q. So it seems like July 8th, 2020, you were  
5 assigned to Gamboa; is that correct?

6 A. Yes.

7 Q. And then you were assigned again --

8 A. Yes.

9 Q. -- April 30th, 2021; is that right?

10 A. Yes, ma'am.

11 Q. Okay. What happened in between?

12 A. So the inter -- interdiction unit had just  
13 started, and during that time, I was with them briefly,  
14 I had to go back to patrol because we were short  
15 staffed. A couple of our deputies had been involved in  
16 some shootings, which left my -- my former shift  
17 shorthanded on personnel, so I had to return back to  
18 patrol. I think I spent about a year before I came  
19 back.

20 Q. Okay. And the transfer to patrol, I didn't see  
21 in your 201 file an order transferring you to patrol.  
22 Is that fair?

23 A. Yes. They didn't give me an order. They --  
24 apparently at the time I was on -- I guess you could say  
25 on loan to Gamboa. So any time, they can pull me back.

1 And just like right now they can pull me back to patrol  
2 and I'd be a patrolman or they could pull me to the  
3 courthouse and I'd be at the courthouse.

4 Q. Okay. So they can reassign you at any point?

5 A. Yes, you either transfer orders.

6 Q. But you don't have to have one?

7 A. Typically they're supposed to have them.

8 Q. Sure.

9 A. But they didn't send back. But this time, it  
10 was just a temporary thing.

11 Q. Okay. When you're pointing to things on the --

12 A. Okay. I'm sorry. During the -- the transfer  
13 order on the -- the 78.

14 Q. Okay.

15 A. This was apparently, I guess, the start of the  
16 other program.

17 Q. The start of what program?

18 A. The interdiction unit.

19 Q. Okay. So July 2020 was the -- was around the  
20 start of the criminal interdiction unit?

21 A. Yes, ma'am.

22 Q. Okay. And so tell me more about that?

23 A. They just started up. They were -- it's my  
24 understanding it was a pilot program and, again, we can  
25 go back and forth from -- where we're needed. And at

1 the time, patrol needed me back so I went back to  
2 patrol.

3 Q. Understood.

4 A. And -- and I was there for about a year and  
5 then they were able to pull me back.

6 Q. Okay. And I see that on the 6178 order, you  
7 see the -- this reassignment paragraph? It's about  
8 halfway through the...

9 A. Yes, ma'am.

10 Q. And I see "This reassignment is temporary and  
11 in accordance with" and then there's like a long  
12 paragraph about rules.

13 Is that -- did I read that right?

14 A. Yes. Yes, ma'am.

15 Q. And is that what you're talking about, the  
16 reassignment to Sergeant Gamboa was temporary at that  
17 time?

18 A. Yes, ma'am.

19 Q. Okay. And so then you were taken back to  
20 patrol for a year?

21 A. Yes.

22 Q. Okay. And then can we look at 6177, the other  
23 page, the prior page?

24 A. Yes.

25 Q. And the date on this order again was

1 April 30th, 2021. So this is after the first order; is  
2 that right?

3 A. Correct.

4 Q. And I want to go to the same paragraph. "This  
5 reassignment is in accordance with," and I see the rest  
6 of the paragraph is about rules.

7 Did I read that correctly?

8 A. Yes, ma'am.

9 Q. I don't see the word "temporary" there. At  
10 that time, April 30th, 2021, were you assigned  
11 permanently to the criminal interdiction unit?

12 A. Yes, well, we were assigned under the organized  
13 crime unit -- or organized crime division.

14 Q. Okay. And I see that "reassigned to" -- and I  
15 see "organized crime division;" is that right?

16 A. Yes. Yes, ma'am. And the interdiction unit,  
17 which is another unit that falls under the organized  
18 crime division or it fell under that unit.

19 Q. Okay. So when you were assigned to the  
20 organized crime division on April 30th, 2021, that was a  
21 permanent assignment until you got a new order?

22 A. Yes, ma'am.

23 Q. Okay. I want to look at -- in the same  
24 document which is 84, I want to flip to BC 6204.

25 A. Yes, ma'am.

1 Q. And I see this as a 6204, this seems to be a  
2 training academy certificate?

3 A. Yes, ma'am.

4 Q. For shotgun certification; is that right?

5 A. Yes, ma'am.

6 Q. Okay. Is your 201 file supposed to have all of  
7 your training certificates and training records? I  
8 don't know the answer to this. I don't know how the 201  
9 file is supposed to work. So is -- is the 201 file  
10 supposed to have all your training?

11 A. It is supposed to whatever the county submits  
12 and whatever we submit to the county.

13 Q. Okay. So you have to submit it to the county?

14 A. No, if we do an in-house training, say, like  
15 our agency puts on the shotgun course --

16 Q. Sure.

17 A. -- the county -- they submit the certificate  
18 to -- straight to the training academy. But if I go --  
19 if I go to an outside entity and, say, I take a -- a  
20 course with, say, SAPD, they can submit it, but then  
21 they give us a certificate which we have to submit a  
22 copy to the academy if we want those hours to be toward  
23 our TCOLE hours.

24 Q. Okay.

25 A. That's usually how that goes.



1 Q. Understood. So I see, let's see --

2 A. And at times, there have been times that we  
3 haven't got certificate. They just report it to TCOLE.

4 Q. Okay. That's helpful.

5 So this -- would it be fair to say then  
6 that this 201 file doesn't have all your trainings in  
7 it?

8 A. Not all of them.

9 Q. Sure. And so that makes me think, let's --  
10 let's look at a document here. I'm going to hand you  
11 what has previously been marked Exhibit 73.

12 (Exhibit No. 73 was previously marked.)

13 MS. HEBERT: Charles, do you want this  
14 again?

15 MR. FRIGERIO: No, that's fine.

16 MS. HEBERT: Okay. Mr. Ellsworth?

17 MR. ELLSWORTH: I'm fine. Thank you.

18 Q. (BY MS. HEBERT) I have a copy for myself  
19 somewhere. My copy is going to be in black and white.  
20 It's the same thing that you have. So I don't have a  
21 color copy for myself.

22 I'm handing you what -- what has previously  
23 been testified as the motor vehicle -- oh, shoot, I  
24 can't remember the acronym right now.

25 A. Motor Vehicle Criminal Interdiction.

1 Q. Yes. Motor Vehicle Criminal Interdiction  
2 Conference. Thank you. Did you attend this conference?

3 A. Yes, ma'am.

4 Q. And did you attend this conference in 2021?

5 A. Yes, ma'am.

6 Q. Do you remember attending this conference?

7 A. Yeah, ma'am, I remember. I don't remember all  
8 the details.

9 Q. Sure. We're going to kind of walk through some  
10 of them. Who else attended with you?

11 A. Deputy Babb.

12 Q. Did Deputy -- did Sergeant Gamboa attend it  
13 with you?

14 A. I believe so. Me and Babb, I just focus on  
15 everything.

16 Q. Sure. And did any other Bexar County sheriff's  
17 officers attend, to your knowledge?

18 A. There was a Joseph Garcia. He's currently on  
19 our K-9 unit.

20 Q. Sure. And why did Mr. Garcia or Deputy Garcia  
21 attend? And I know there's a lot of Deputy Garcias, so  
22 I'll be clear. Why did Deputy Joseph Garcia attend?

23 A. You can take a course any time you want. You  
24 can go to a conference any time you want. I've gone to  
25 other conferences and I've seen other deputies that were

1 on patrol that have nothing do with what -- it's up  
2 to -- it's up to any deputy if they want to take a  
3 course there, if they get approved by the county to pay  
4 for it or they pay for it out of their own pocket, it's  
5 up to them if they want to go.

6 Q. Got it. And did the county pay for this course  
7 for you. Do you remember?

8 A. I don't remember offhand.

9 Q. That's okay. Can you walk through the agenda  
10 with me. It seems like the first day is just, like, the  
11 welcome day, so we'll skip the 29th. Monday,  
12 August 30th, seems like there's the formality stuff. I  
13 want to look at the -- the item that's at 9:30 to 11:30.

14 A. Yes, ma'am.

15 Q. "Target Selection" by Shawn Pardazi. Am I  
16 saying that right?

17 A. I want to say yes.

18 Q. It's okay. If you don't mind, I don't mind.

19 Do you remember what you learned from this  
20 course?

21 A. Not offhand. I've taken so many courses  
22 similar. But usually what I know is it's helping us  
23 identify possible vehicles that commit -- pretty much  
24 traffic infractions on how to, you know, identify a  
25 possible smuggling vehicles.

1 Q. Okay. And what did you learn about that?

2 A. On that, I'll just say I don't recall. But  
3 usually typically, it involves traffic movements, how to  
4 identify if they're -- you know, their -- how their  
5 reaction is to law enforcement on the roads, things of  
6 that nature.

7 Q. What do you mean by "traffic movements"?

8 A. I think a traffic violation, say that  
9 they're -- they might be going a hundred miles an hour  
10 on a 70 mile per hour roadway and they have to pretty  
11 much really hit their brakes when they see us and how  
12 does the car respond. If the car dip really low because  
13 of the momentum of the vehicle. Are they hiding behind  
14 an 18-wheeler, following too closely. You know, traffic  
15 violations.

16 Q. Okay. Anything else besides the -- the driving  
17 characteristics in terms of target?

18 A. That's usually -- usually what I remember on  
19 that part.

20 Q. That's fine.

21 A. It's been a few -- it's been a couple years  
22 obviously.

23 Q. Understand. Go to the next page. There's  
24 another class at 1300 hours. Do you see that one,  
25 second line?

1 A. Yes, ma'am.

2 Q. "Evading Honesty," also by Shawn Pardazi. Do  
3 you remember what this course would have included or  
4 what you learned from this course?

5 A. I don't recall. I've taken courses similar to  
6 it. But that's -- that's -- I don't recall exactly what  
7 he talked about that day.

8 Q. Sure. You can tell me about what you've taken  
9 similar to it then, as you generally understand the  
10 takeaways of the class?

11 A. Basically how a person can either be -- I  
12 guess, signs of them not being truthful just by roadside  
13 interviews and things of that nature.

14 Q. Okay. And what are those signs?

15 A. There could be many indicators. How do they  
16 respond to a question, holes in the story, you know, are  
17 they coming from this place. Going to -- saying they're  
18 going here, but their story and timeline doesn't add up.  
19 It just -- it can be many different things.

20 Q. Okay. Would physical behaviors also be  
21 something that you're looking for for these assessing  
22 behavior?

23 A. Yes.

24 Q. And then the 1500 -- 10 -- or the line that  
25 says 1510, that would be the same course, the

1 continuation of it?

2 A. Yes, ma'am.

3 Q. Let's go to Tuesday, August 31st, 8:15 to 9:45.  
4 Do you see the line that says, "Rapid Accessing the  
5 Passenger Car" by Mike Tamez 720?

6 A. Yes, ma'am.

7 Q. Do you remember what this course was about?

8 A. I don't remember that exact course. I remember  
9 attending the course, I just don't remember it.

10 Q. Okay.

11 A. I've taken a couple of his courses.

12 Q. And do you remember generally what you've  
13 learned from Mr. Tamez in 720 courses?

14 A. Basically how to assess a vehicle and that's  
15 basically -- that's about it, how to assess a vehicle.  
16 What -- if there's any deficiencies or anything that  
17 might look out of place.

18 Q. What do you mean by "how to assess a vehicle"?

19 A. Basically if -- and seeing if there's any  
20 deficiencies like you walk up and there's a crease in a  
21 part of the vehicle there shouldn't -- there shouldn't  
22 be a crease.

23 Q. Okay.

24 A. If there's, you know, work on a vehicle that  
25 may or may not have been done recently, and those are

1 questions, you know, you can ask the driver or something  
2 or something like that, how to assess it just on walking  
3 up to the vehicle.

4 Q. Okay. So it seems like you're telling me that  
5 this course was only about looking at a particular  
6 vehicle. Is that what the course was about to your  
7 memory?

8 A. I don't want to say yes or no. I don't recall  
9 exactly what this exact course was, not this one. But a  
10 lot of his classes have to do with how to assess  
11 vehicles.

12 Q. Okay. I'm going skip down to "CMV's and  
13 Smuggling." Do you see that line of 1510?

14 A. Yes, ma'am.

15 Q. What would this course be on?

16 A. Commercial motor vehicles. And how they -- how  
17 they're used to smuggle narcotics, weapons, money,  
18 drugs -- people. And basically mostly pertains to,  
19 like, 18-wheelers and, you know, delivery trucks.

20 Q. Okay. And then you've got the same course  
21 again at 10:00 to 11:35 on Wednesday, September 1st?

22 A. Yes, ma'am.

23 Q. You see that "CMV's and Smuggling." That  
24 would, like, be a continuation of the prior course?

25 A. Yes, ma'am, it was a two-part.

1 Q. Okay. I want to look back a little bit at the  
2 Tuesday, August 31st. We were talking a little bit  
3 about the classes by Mike Tamez from 720. I see the  
4 title to be "Rapid Accessing the Passenger Car."

5 Do you see that?

6 A. Yes.

7 Q. And you've been talking a lot about assessing.

8 A. Ma'am, but that's -- I don't understand  
9 assessing. Maybe I'm misunderstanding the word.

10 Q. Accessing to me means getting inside of or  
11 getting information from, getting access to, versus  
12 assessing is like evaluating. So this seems, just by  
13 the title, seems to be about getting into a passenger  
14 car. Does that jog your memory at all?

15 A. Not necessarily. Most of his -- again, most of  
16 his courses I've taken, I think one or two is about  
17 basically looking at the vehicle and seeing deficiencies  
18 in and outside of the vehicle. If you get in the  
19 vehicle or you don't get in the vehicle, what are  
20 deficiencies and things like that.

21 Q. Okay. What is the point of identifying  
22 deficiencies?

23 A. What looks normal, what's not normal.  
24 Basically if -- if you're -- say you look at a car, your  
25 reason, whatever your probable cause to search the



1 vehicle and you see that part of, say, the floorboard is  
2 higher than what is typically supposed to be, you look  
3 at, okay, well, what's around it. Okay. Can you knock  
4 on it? Does it sound hollow? Does it sound normal? Is  
5 it -- what's the typical way of vehicle -- have you  
6 looked -- have you looked at this vehicle before. Does  
7 this look right? Is there tooling? Is there tooling  
8 meaning that say the bolts on the -- that hold your seat  
9 down, have they been removed. What reason is it for  
10 them to be removed? You know, things --

11 Q. Well, it sounds like all the things that you're  
12 talking about seem to be like details. Some of them  
13 come up when you search a vehicle. Is that fair?

14 A. It can be from searching a vehicle. It can be  
15 looking -- just looking at the vehicle. Before you even  
16 get in a vehicle, you're walking up and you're just  
17 seeing if there's anything wrong with the car.

18 Q. Okay. And when you're looking to see if  
19 there's anything wrong with the car, why are you looking  
20 to identify that information?

21 A. Well, just things to keep basically notes.  
22 Just kind of keeping in the back your head that, hey,  
23 this might be something. But you don't know until you  
24 go on with the traffic stop.

25 Q. Sure. Let's look to Thursday, September 2nd.

1 No, actually. I didn't realize that Wednesday continued  
2 on -- Wednesday, September 1st, the next page. There's  
3 another "CMV's and Smuggling" class. We've already  
4 talked about that. Can you look at the -- the line that  
5 starts with 0510 to 1650?

6 A. Yes.

7 Q. "15 Tactics to Greater Success" by Dennis  
8 Benigno from Street Cop?

9 A. Yes, ma'am.

10 Q. Can you tell me about that course?

11 A. I don't recall it offhand. I -- I don't -- I  
12 may have taken one or two, three cop conferences. And,  
13 again, I just don't remember offhand.

14 Q. It's okay. Do you have any idea what the  
15 course might have been about, to your memory, based on  
16 what you know about Street Cop courses?

17 A. They take -- Street Cop has a wide range of  
18 courses that they offer. They don't just offer  
19 interdiction. They do a wide range from like leadership  
20 classes to target somebody to, excuse me, I guess, about  
21 laws and case law, and they have a wide range of  
22 instructors and a wide range of courses throughout the  
23 country.

24 Q. So you couldn't say what this course is about?

25 A. I don't -- I don't recall it offhand.

1 Q. Okay. Sure.

2 A. It's been a few years.

3 Q. And then Thursday, September 2nd, I see another  
4 "Vehicle Selection" this time by Kenny Williams of  
5 Street Cop. This would have been along the same lines  
6 as the prior vehicle selection course?

7 A. The target course was a --

8 Q. Oh, yeah, the target selection, sorry.

9 A. Yes, what I got from this one is almost the  
10 same thing.

11 Q. Okay. And the "Hidden Compartments" course,  
12 the next two lines down?

13 A. Okay. Usually there are about -- I don't  
14 recall what his is but hidden compartment shows you,  
15 like, where to kind of look for compartments typically  
16 put into the smuggling vehicles, such as if they remove  
17 the air bag out of the passenger side, you know, what to  
18 look for.

19 Q. Got it.

20 A. You know, things that stand out. Again, as  
21 everybody, has mentioned like tooling on the vehicle  
22 that where there shouldn't be tooling. You know -- you  
23 know, has the vehicle is raised up, the floor looks  
24 raised, something just doesn't -- you know, things that  
25 are off.

1 Q. Yeah. Sure. The title of this course -- this  
2 conference is "2021 Motor Vehicle Criminal Interdiction  
3 Conference." And I want to go back to this "15 Tactics  
4 to Greater Success." What does success look like for  
5 criminal interdiction in the motor vehicle context?

6 A. If you're finding somebody that's in the  
7 commission smuggling anything.

8 Q. Okay.

9 A. Anything contraband, illegal.

10 Q. Anything contraband.

11 We can put that one to the side. Thank  
12 you.

13 So we know that your 201 doesn't have all  
14 of your -- your trainings in it. I want to talk about  
15 your criminal interdiction specific trainings without  
16 having, you know, the reference materials to guide us.  
17 Can you walk me through the trainings that you have  
18 attended that you found most helpful for doing your  
19 criminal interdiction work?

20 A. Honestly, just about -- I would say all of  
21 them. I've taken -- I may not remember all the  
22 trainings but I've taken first aid word for word,  
23 obviously, but I've taken bits and pieces.

24 Q. Yeah.

25 A. And obviously, you put it -- add it to the

1        toolbelt and all that stuff. A lot of them talk about,  
2        you know, what to look for, what talk -- behavior. But  
3        I'm told, you know, talk about, you know, when you get  
4        in the vehicle what to look for, things of that nature.  
5        That's a lot of what -- I -- I take away from all of  
6        those.

7            Q. Okay. Did you ever attend a desert snow  
8        training?

9            A. Yes, ma'am.

10          Q. Do you remember when?

11          A. I think that was -- that was my very first  
12        start of patrol. I want to say it's 2017 or 2018.

13          Q. That's okay. Do you remember what that  
14        training was about?

15          A. Interdiction. I really didn't understand it to  
16        be interdiction at the time because I didn't know what  
17        interdiction really was at the time.

18          Q. Okay.

19          A. I just knew it as that I know that there are  
20        smugglers in the county and this is a possible way of  
21        identifying and what to look for in a vehicle that may  
22        be involved in smuggling.

23          Q. Okay. And we talked a little bit about 720.  
24        You said you had been to several 720 trainings other  
25        than the one that was part of the 2021 Motor Vehicle

1 Criminal Interdiction Conference?

2 A. I believe I've been to one or two. I don't  
3 recall offhand.

4 Q. Okay. What do you remember from those?

5 A. Basically the same thing. Identifying  
6 behaviors, identifying vehicle movements, identifying,  
7 you know, deficiencies within the vehicle, you know,  
8 interviewed -- some interview techniques. That's really  
9 about it.

10 Q. I mean, okay. What do the interview techniques  
11 look like?

12 A. He's talking, asking questions. Assessing if,  
13 you know, what's -- what's really pertinent to the  
14 traffic stop. You know, asking -- you know, asking  
15 questions, it's where are you coming from. Hey, you  
16 know, where are you going. You know, look -- you know,  
17 looking at how a person reacts to a question. You know,  
18 people, a lot of behaviors, you know, how the mind  
19 reacts to certain questions. So -- and I still use a  
20 lot of that today.

21 Q. What do you mean by "how the mind reacts to  
22 certain questions"?

23 A. So if someone is telling you the truth, you  
24 know, a lot of the way they will tell you is they can --  
25 they can ramble it off. They can tell you, you know,

1 I'm going to my aunt's house over off of Commerce and  
2 Nueva. Okay. Where are you coming from? And sometimes  
3 they will take a long pause. You should be able to tell  
4 me where you're coming from.

5 I'm coming from my house over off of  
6 Jackson -- Jackson Keller Road. Okay. But you have to  
7 think about, you know, the response to it. A lot of  
8 them I'll ask people is, you know, are you carrying any  
9 weapons and see their answer to that. I'll ask them,  
10 okay, well, is your ID the information on your ID  
11 correct. And if it's not correct, you know, I'll see  
12 how they answer that.

13 I ask about narcotics. A lot of narcotics  
14 information, you ask a direct question, so sometimes  
15 I'll list them out do you have weed, do you have  
16 marijuana, such and such, so on. And I watch their  
17 response.

18 Q. Sure.

19 A. A lot of times I've caught people is --and I've  
20 asked them directly is they'll -- the response to a  
21 certain drug and they'll be quiet or their voice will  
22 whisper -- the audible tone changes, they'll look  
23 around. They'll look very, like, I guess, in a sense  
24 defeated. They look down, it's almost like if you have  
25 a kid and you ask them did you take something out of the

1 cookie jar and they kind of like take forever to answer.  
2 I always refer to kids. Because I have kids of my own,  
3 if you know how to talk to your kids, you know -- and  
4 they -- it's pretty much -- it's almost the same thing.

5 Q. Sure.

6 A. It goes hand in hand really well.

7 Q. What about Street Cop training, do you ever  
8 attend a Street Cop training other than the one in this  
9 conference we looked at?

10 A. I believe -- I believe I did one.

11 Q. Okay.

12 A. I don't -- I don't really remember offhand too  
13 much what it was about.

14 Q. Do you happen to attend a Street Cop  
15 conference?

16 A. No.

17 Q. I feel like I might have seen something about  
18 that.

19 A. I wanted to when I think they were in Tennessee  
20 but I just didn't have the time -- because it would have  
21 been out of my pocket. I didn't have the time or the  
22 money. And, you know, I had other -- other -- other  
23 priorities to take care of.

24 Q. Sure. So you remember one other Street Cop  
25 training?



1 A. Yes.

2 Q. Okay. Any other trainings that stick out in  
3 your mind that you attended for criminal interdiction?

4 A. A lot of them -- I've taken a couple through  
5 HIDTA. They --

6 Q. H-I-D --

7 A. T-A.

8 Q. T-A.

9 A. Yes, ma'am. They put on a lot of free -- free  
10 trainings. They bring in people that have been doing  
11 the job for a while. Whether they were federal agents  
12 or they were -- they were TFOs in the past. I've taken  
13 some CMV courses that --

14 Q. CMV stands for?

15 A. Commercial motor vehicle.

16 The Ray Herndon, which is listed in here, I  
17 took his, I think, two or three-day class in Houston. I  
18 went to Houston for that one. I paid that one -- I  
19 believe I paid for that out of my pocket.

20 Q. Okay. This is the Diamond Back?

21 A. Yes, ma'am.

22 Q. Okay.

23 A. I took that course. I have taken -- I even  
24 went as far as taking the negotiator -- the basic  
25 negotiator course to kind of help understand behavior.

1 Q. Okay. Tell me about the negotiator course?

2 A. The negotiator course teaches you how to deal  
3 with people that are in crisis or you're responding to  
4 a -- a high -- high crisis event such as a barricaded  
5 subject, someone that's got hostages. I believe it's a  
6 full week. And they are running you through scenarios  
7 every day. I went through our -- our agency's basic  
8 negotiator course.

9 Q. Okay. Through -- in -- that Bexar County  
10 itself put on?

11 A. Yes, ma'am.

12 Q. And I was just listening to, I want to make  
13 sure I understood all of the things that you learned in  
14 that. Some of the -- you learned skills for intense  
15 high stress conversations. Is that fair?

16 A. Yes, ma'am.

17 Q. Hostage negotiations?

18 A. I won't say hostage negotiations. More how to  
19 talk to people. Again, it's for the people that may  
20 have people hostage or may be barricaded. It just, you  
21 know, how to deal with those situations. Mostly I took  
22 it to help to understand, you know, audible. Because a  
23 lots of times you're talking to people and it's maybe  
24 ear to ear.

25 Q. Over the phone?

1           A. Yes. And you get an understanding of where's  
2           their voice at, where they're possibly at, what's --  
3           what bothering them. What's -- how to get them calm.  
4           How to get them to possibly hopefully come out, things  
5           of that nature.

6           Q. Did you also practice face-to-face  
7           conversations?

8           A. Yes. We've done face to face -- I want to  
9           say -- I don't want to say scenario. But a lot of them  
10          were over the phone.

11          Q. Okay. A lot of them were over the phone but  
12          you did do some face-to-face practice?

13          A. I'm trying -- I'm trying to remember that one.

14          Q. It's okay.

15          A. I don't know if it's that one or taken another  
16          course or we've done face to face.

17          Q. Did you do any interrogation training through  
18          this negotiation piece?

19          A. No. No.

20          Q. And what were -- what were the main takeaways?  
21          Like, what were the main takeaways from the  
22          negotiation -- negotiation training?

23          A. For me it was a lot of de-escalation.

24          Q. Okay.

25          A. I learned a lot of de-escalation. Helping to

1 understand audible -- again, audible tone does a lot for  
2 me, because it helps me understand where, you know,  
3 where you're at mentally -- possibly mentally. I use a  
4 lot of it because I've had traffic stops that just have  
5 really gone sideways and I've had to talk people --  
6 basically spend the whole traffic stop de-escalating the  
7 person why they're being stopped.

8 Just like, hey, look, I'm not trying to hem  
9 you up. I'm just telling you you just committed a  
10 traffic violation. And I've had them where it's 20 to  
11 30 minutes is you're talking, and I have to tell them,  
12 look the conversation works you talk, I talk, you talk,  
13 I talk. You know, that's how this is going to work  
14 properly. And to the point where, you know, just trying  
15 to understand, because some people, again, they go --  
16 when you're on a traffic stop, you never know, they  
17 might be in crisis. They might be one of the people  
18 that are on AMBER Alert.

19 They might be -- a lot of the situations.  
20 That's why I take -- when I first started taking some of  
21 the course, you know, I looked for things that stick  
22 out. Do they have a child in the back that might be in  
23 distress? Interdiction does a lot of, you know, they  
24 stop a lot of that stuff. So it's -- I've taken a lot  
25 of things for a wide range.

1 Q. Sure.

2 A. I've taken SWAT courses advanced and basic SWAT  
3 just to -- just to help understand if I need to go to an  
4 active shooter event. How to properly prepare corners.

5 Q. Understood.

6 A. My last day of my basic SWAT course, we cleared  
7 the Eagle mall. Not because we wanted to, it was  
8 because there was an active shooter. The very last day  
9 of my SWAT course, I had to go in with only one pistol  
10 and one Magphon radio. That's just what it was.

11 Because right after we graduated, and  
12 everything was said and done, a call came out and that's  
13 where we had to go. I didn't have a chance to fully  
14 reset everything and -- you know, restock all my stuff  
15 properly. I just had to go.

16 Q. Understood.

17 A. So -- so that's why I take a lot of courses.  
18 What's going to else help me benefit overall in my job.

19 Q. Understood. And thank you for your service.

20 I want to talk a little bit more about  
21 de-escalation. It sounds like you run into people at  
22 all range of life situations when you're doing traffic  
23 stops. Is that fair?

24 A. Yes, ma'am.

25 Q. And when someone is, for lack of a better

1 descriptor, freaking out, then you have to use  
2 de-escalation tactics on the side of the road. Does  
3 the -- does the fact that the person is freaking out on  
4 the side of the road and you're using those  
5 de-escalation tactics, does that mean that that person  
6 is hiding something?

7 A. Not necessarily. I have had them where they've  
8 been, right off the bat, belligerent, angry, and some  
9 who are, they're just having a bad day. And then I've  
10 had them just go off on me because they are actually  
11 hiding something.

12 Q. Okay. But you wouldn't necessarily tell if  
13 someone was belligerent and angry whether it was hiding  
14 something or having a bad day?

15 A. I go through the -- how does the interview go?  
16 What's the response to my questions? What's going on?  
17 I just found out my wife is cheating on me and I'm just,  
18 you know, I'm just really not paying attention to the  
19 road. Okay. Well, what happened, you know. That's  
20 when you kind of go into a discussion. What's wrong  
21 with you and your wife? What's going on with -- why are  
22 y'all having some issues? Maybe -- maybe this dude  
23 committed a crime. Maybe he assaulted his wife and he's  
24 on the run. Maybe he killed his wife. You know,  
25 what -- what do we have going on with it.

1                   Or I've had some people that if they can  
2                   answer straight out. Again, it goes back to what's  
3                   their behavior when I ask a certain question. I've also  
4                   had them where they've been defensive. Hey, do you have  
5                   anything going on? Why are you upset? Well, you're  
6                   pulling me over. I always have problems. You cops are  
7                   always harassing me. Hold on, dude, you've never met  
8                   me, I'm not -- I've never met you. This isn't, you  
9                   know, I get it, people don't like us. It's okay. I'm  
10                  not mad at you for it. I understand that this is the  
11                  climate, this is the culture. People don't like it  
12                  sometimes. That's just what it is.

13                  But why are you upset with me that I pulled  
14                  you over and I -- when I walk up I tell them, hey, I'm  
15                  pulling you over for, you know, this and this. This is  
16                  what I see. And they'll go, well, that's -- shouldn't  
17                  you be out finding criminal. Okay. Well, why are  
18                  you -- why are you upset with me. You know, then  
19                  sometimes I found them, they've had ounces of dope in  
20                  their car or they've been hiding stuff in the car or  
21                  they had a gun or they had something in their vehicle.  
22                  It varies.

23                  Q. But is the converse true too, that they didn't  
24                  have anything in their vehicle?

25                  A. Again, it all goes through the -- the

1 interview. And I try to figure out is what do they  
2 really being defensive about.

3 Q. Okay. So would it be fair to say that every  
4 stop you have to do an interview?

5 A. The whole stop is an interview. Whether it's,  
6 you know, a quick, hey, how are you doing. This -- I'm  
7 Deputy Gereb, this is why I pulled you over. Okay.  
8 Where are you coming from? Okay. Well, be right back.  
9 Here's your warning, here's your citation, drive safely.

10 Or, you know, if I feel that there's  
11 something going on, I feel that my reasonable suspicion  
12 is kind of a little more, I'll go from there.

13 Q. I want to go back to this negotiation training  
14 piece. You talked a little bit about dealing with  
15 people who are on the phone.

16 A. Yes.

17 Q. You talked a little bit about dealing with  
18 people who are barricaded.

19 A. Yes.

20 Q. Potentially barricaded. Barricaded or  
21 potentially barricaded. You talked about dealing with  
22 people who might have hostages or potentially have  
23 hostages. Is that fair? You learned about all those  
24 things in negotiation training?

25 A. Yes, ma'am.



1 Q. Were the general principles of negotiation  
2 training the same for dealing with those types of  
3 situations versus doing a traffic stop, for example?

4 A. No. Not necessarily. I -- I use it because if  
5 I ever have to use -- if I get put in that situation  
6 where I'm the first one on contact if something does --  
7 does go a little awry or sideways, I can be the person  
8 working with de-escalation.

9 Q. Okay. So you didn't use your negotiation  
10 training in doing traffic stops?

11 A. No. No.

12 Q. So you didn't use the -- I just want to make  
13 sure that's clear on the record, because you said no.  
14 And I -- my question wasn't well phrased.

15 So you did not use your negotiation  
16 training in doing traffic stops?

17 A. No, I don't use my negotiation training. Only  
18 if I see, though, that someone might be in a crisis.

19 Q. Okay.

20 A. That's the only time I will see that. You can  
21 identify it. You can see if someone is crying,  
22 someone's erratic. You okay? Do you need someone to  
23 talk to? I've had people where I just turned it into a  
24 warning. I spend 20, 30-minute on the side of the road  
25 just talking.

1 Q. Understood. Understood.

2 I want to talk a little bit about the  
3 ridealongs you talked about having done. Do you  
4 remember talking about ridealongs with Collin County,  
5 for example, folks in Collin County?

6 A. Yes, ma'am.

7 Q. When did you do those ridealongs?

8 A. With Collin County, I don't -- I want to say it  
9 was in 2022.

10 Q. Okay.

11 A. I don't remember the exact month.

12 Q. That's okay. General gist is fine. Probably  
13 somewhere in 2022, you went to Collin -- you went to  
14 Collin County?

15 A. Yes.

16 Q. Did anyone else go with you?

17 A. Deputy Babb. We -- we drove up separately.

18 Q. You drove up separately?

19 A. Yes.

20 Q. But you both went there?

21 A. Yes, ma'am.

22 Q. How long -- how many days were you there?

23 A. I want to say four.

24 Q. Four.

25 A. Four or five.

1 Q. Okay. And what happened during those four to  
2 five days?

3 A. Collin County has a -- an interdiction team  
4 that's well established, it's a multi-agency  
5 interdiction team. So we went up there to learn how  
6 they do their techniques, how they learn -- do different  
7 forms of interdiction. You know, how they -- how  
8 they -- to learn how a well established interdiction  
9 unit works.

10 Q. How a well --

11 A. Established.

12 Q. -- established interdiction unit works?

13 A. Yes.

14 Q. Okay. And what did you learn?

15 A. Just different -- pretty much almost the same  
16 thing I've always learned, it's just how -- how another  
17 agency puts it in play.

18 Q. Okay.

19 A. And how, you know, how their policies and how  
20 they go with their rules and stuff like that.

21 Q. Understood. So did you come back from Collin  
22 County and say let's do X, or let's do Y?

23 A. No. It's given me ideas on how to, you know,  
24 how to sharpen my skills. Other than that I haven't --  
25 it's --

1 Q. What do you mean by ideas. What ideas?

2 A. You know, okay, well, maybe you should -- well,  
3 you're asking this question. Well, maybe you could  
4 asking this question. Or maybe you should try different  
5 styles and interview techniques.

6 Not everybody has to do it the same way.  
7 Everybody, you know, is having their own style of  
8 traffic stop and how you run it is -- is more  
9 beneficial.

10 Q. Understood. Understood.

11 Did the folks in Collin County do front  
12 seat interviews?

13 A. They did front seat interviews.

14 Q. Okay.

15 A. But while we were there, they didn't do it  
16 because there was two of us riding with them.

17 Q. They didn't have enough space?

18 A. Yes.

19 Q. So did they do out of the patrol car interviews  
20 then?

21 A. Yes, ma'am.

22 Q. Okay. But that was only because you and Deputy  
23 Babb were there, to your understanding?

24 A. Yes, ma'am.

25 Q. Did Collin County and the interdiction group up

1       there, did they have a K-9 unit part of the interdiction  
2       group?

3             A.   Yes, ma'am.

4             Q.   And I feel like I also remember you also  
5       talking about -- I'm sneezing again. Hold on. I don't  
6       want to sneeze in the middle of talking.

7                     I feel like I also remember you also  
8       talking about doing a ridealong with El Paso County. Am  
9       I remembering that right?

10            A.   It wasn't El Paso County. It was -- I forget  
11       what district attorney's group they were -- they are,  
12       but it's -- they basically run HITS, which is a high  
13       intensity -- highway interdiction, I can't remember the  
14       whole HITS stands for. But the training group what  
15       their actual -- and I believe they're retired now.

16            Q.   Okay. So there's some training group that you  
17       went and did additional training with?

18            A.   Yes, ma'am.

19            Q.   You think it was through HITS.

20            A.   It was through HITS.

21            Q.   Okay. And what did that entail?

22            A.   The -- the same thing that we did with Collin  
23       County.

24            Q.   Okay. So spell it out for me. Did you do  
25       ridealongs?

1           A. Yes, we did ridealongs. We watched them, how  
2 they do traffic stops.

3           Q. You watch them how they do traffic stops while  
4 they were doing them?

5           A. Yes. Yes.

6           Q. You didn't watch it on, like, TV or something  
7 like that?

8           A. No. No. No. We were out there -- physically  
9 out there watching.

10                   They showed us what to look for --

11           Q. Okay.

12           A. -- you know, things -- keys to look for. Let's  
13 say you're going on a vehicle watch, you know, watch how  
14 this person reacts to us. Then you see certain types of  
15 vehicles pass by. Look at certain things in that,  
16 vehicle, what may stand out to you. The guy I rode  
17 with, he liked do a lot of 18-wheelers. And, you know,  
18 he provided me some pointers on how to do 18-wheelers.  
19 So that's kind of what I enjoyed doing.

20           Q. Understood. Have you ever heard of a spidey  
21 sense?

22           A. Yes, ma'am.

23           Q. In terms of doing criminal interdiction work?

24           A. Yes, ma'am.

25           Q. What does that mean?

1           A. I guess in a sense with somebody that standing  
2 out and you feel this it -- I guess, like, you see  
3 something or you're hearing something and it's standing  
4 out to you making the traffic stop not a normal --  
5 something normal or interaction with a person or you're  
6 clearing a house, something is not right, something is  
7 not normal. Like the hairs on the back of your neck are  
8 standing up. Like something is not right.

9           You know, on traffic stops, I've talked to  
10 people that ask certain questions, their responses to  
11 certain things have -- something is not right, something  
12 is inconsistent here. Let me clarify a little bit more  
13 and let me ask more questions into that. I've cleared  
14 houses where nobody might be there or somebody might be  
15 there. Like, hey, this isn't normal. I see, you know,  
16 I see a tear down or I see a crack in the door.  
17 Something might be going on.

18           You know, just something that takes you --  
19 you have taken a little extra precautions and you assess  
20 it a little bit more.

21           Q. Okay. So I guess -- unpacking that trying to  
22 understand. It sounding like spidey sense is like your  
23 gut feeling that something might be off. Is that fair?

24           A. I don't say gut feeling. I want to say it's  
25 based on my training and experience and knowledge that

1 something is not right.

2 Q. Okay.

3 A. I've done --

4 Q. But you can't always articulate exactly what it  
5 is. Is that fair?

6 A. What do you mean by that? I'm sorry.

7 Q. You said it's based on my training and  
8 experience that something is not right?

9 A. So let's say going back to the searching of a  
10 vehicle.

11 Q. Sure.

12 A. I look at a vehicle and I see that the  
13 floorboard is lifted up a little higher. Something is  
14 not right because I searched a vehicle like this three  
15 days ago and the floorboard look kind of lower.  
16 Something is not right. Or this person's response to  
17 this is not how he's been responding to all the other  
18 questions. Something's not -- something may not be  
19 right. Let's assess it a little bit more.

20 Q. Got it. That's helpful.

21 Any other training that just comes to mind  
22 that I might have missed when talking to you about what  
23 you use for your criminal interdiction work?

24 A. No, ma'am.

25 Q. Okay. And you mention that you still use that



1 training today?

2 A. Yes, ma'am.

3 Q. How do you use the training today?

4 A. So I -- I still do traffic stops. Just because  
5 our unit got shut down, I still do traffic stops. I  
6 still assess if -- let's say, they are UCs, need help  
7 with a traffic stop.

8 Q. UC?

9 A. Undercovers. I still -- I said I still develop  
10 all that. It's not going to change.

11 Q. Okay. So the way -- even though the criminal  
12 interdiction unit is no more, the way you're going to do  
13 traffic stops is not going to change?

14 A. No, ma'am.

15 Q. What is your current position today?

16 A. I'm assigned -- I was reassigned to more  
17 organized crime unit helping out our -- our undercovers.

18 Q. Okay. What does that -- what does that mean?

19 A. So I'm the -- basically the uniform guy that  
20 sits with basically if they have information that --

21 Q. Okay. So you're the guy in someone's ears so  
22 when they say come in come help me you're the guy who  
23 comes in?

24 A. In a sense, yes.

25 Q. Okay. So you're like the back up guy for the

1 undercover people?

2 A. In a sense, yes.

3 Q. Okay. Thanks for, like, you know, helping  
4 humoring my, you know, crime fiction fantasies there.

5 A. It's -- it's entertaining at time. I don't  
6 know why it is entertaining. But I'm like why? Maybe I  
7 should go on y'all's side.

8 Q. Is that what you want to do, the undercover  
9 part?

10 A. I'm not sure. I'm not sure. I've expressed  
11 interest but I'm still -- I've also expressed interest  
12 in getting on a SWAT team as well.

13 Q. Understood.

14 A. So it's been -- and I've also expressed  
15 interest in maybe going to the training academy.

16 Q. To teach?

17 A. Yes. Because I'm also a breacher instructor as  
18 well.

19 Q. A what?

20 A. Breacher instructor.

21 Q. I don't understand.

22 A. Basically it's a -- I've taken a lot of active  
23 shooter trainings through the Alert agency. One on them  
24 you have to go to to become a breacher and you learn how  
25 to breach doors with a shotgun, with a ram, things of

1 that nature.

2 Q. I understand.

3 A. And I'm also an instructor for that.

4 Q. Okay. That's helpful.

5 Do you ever teach how to do traffic stops?

6 A. No, no, I have not.

7 Q. And how did you learn that your position had  
8 changed?

9 A. So with the -- the problem with human smuggling  
10 on our highways have put a lot of people in danger. And  
11 through -- for the lack of safety, not just us but --  
12 and all these people that are being smuggled, we ran  
13 into issues and we also had reported from other agencies  
14 that people were taking off in the -- for whatever --  
15 obviously, they're in the commission of a crime. But  
16 they're taking off and they're crashing and it's causing  
17 a lot of injuries to people.

18 And so we felt as an agency and I agree as  
19 a unit that that part of the interdiction needed to kind  
20 of go away.

21 Q. I understand.

22 A. It's too dangerous.

23 Q. And Sergeant Gamboa is still your current  
24 supervisor; is that right?

25 A. Yes, ma'am.

1 Q. We just talked a little bit about the criminal  
2 interdiction unit ending. We previously talked about  
3 and during your last deposition Sergeant Gamboa  
4 approached you about being on the criminal interdiction  
5 unit.

6 Do you remember that?

7 A. Yes.

8 Q. Why did you agree to be part of the criminal  
9 interdiction unit?

10 A. It was a -- I guess a way to be a part of  
11 something more than just being a patrolman. I do enjoy  
12 the idea of taking drugs off the street and getting  
13 people that are commission of doing bad things that can  
14 do bad -- harm people in our city off the street. So --  
15 and it's -- in catching -- I guess it's catching the  
16 source. Trying to get it to the source has always been,  
17 you know, the ultimate goal, I guess, of any law  
18 enforcement agency.

19 Q. Got it.

20 I understood that you used to wear a tan  
21 uniform; is that right?

22 A. Yes, ma'am.

23 Q. Do you wear a blue uniform now?

24 A. Yes, ma'am.

25 Q. Okay. Before -- so Mr. Schott filed this

1 lawsuit on June 1st of 2023. Before Mr. Schott filed  
2 this lawsuit, did anyone in the sheriff's office ever  
3 indicate to you that the criminal interdiction unit was  
4 ending?

5 A. No. I've always gone about my day, it's hey,  
6 your -- just like when I got sent back to patrol. I was  
7 like okay. This can be ending. Okay. Where to next?

8 Q. Sure. And obviously you don't have like a, you  
9 know, real stake in the game. But what I'm really  
10 asking is as of June 2023, did you have any  
11 understanding that the criminal interdiction unit would  
12 be ending at that time?

13 A. No, ma'am.

14 Q. Okay. When did you learn that the criminal  
15 interdiction unit would be ending?

16 A. December.

17 Q. December of what year?

18 A. December 2023.

19 Q. Okay. To your knowledge, did Mr. Schott's  
20 lawsuit have -- play any role in the termination of the  
21 criminal interdiction unit?

22 MR. FRIGERIO: Object to form.

23 THE WITNESS: No, ma'am.

24 Q. (BY MS. HEBERT) Okay. I want to talk about  
25 the Northwest Highway Group?

1 A. Yes, ma'am.

2 Q. Do you know what that is?

3 A. I believe it's a group that operated off of  
4 WhatsApp.

5 Q. You believe. You don't have any personal  
6 knowledge of it?

7 A. I don't recall what the name was. But I know  
8 it -- it was people that I believe we worked off of  
9 WhatsApp. I had heard the name, I just don't remember  
10 the group on WhatsApp.

11 Q. Okay. Were you part of a group on WhatsApp?

12 A. Yes, ma'am.

13 Q. What group were you part of on WhatsApp?

14 A. I believe it's going to be that Northwest  
15 Highway Group.

16 Q. Okay. What was the purpose of that group?

17 A. It was just one of the many sources that  
18 provided information to people that are possibly  
19 smuggling.

20 Q. Was providing information to people who were  
21 possibly smuggling?

22 A. So like I mentioned last time, I have many  
23 people giving me information. Whether it's a  
24 confidential person, which I don't manage those, or, you  
25 know, a resident could tell me when I was a patrolman

1 I'd ask residents --

2 Q. I want to pause you because it's a little bit  
3 hard to understand what you're saying.

4 There are confidential information sources.  
5 You don't manage those?

6 A. I don't manage those, I turn those over.

7 Q. And there are people, did you say resings?  
8 Or --

9 A. Residents.

10 Q. Residents. Okay.

11 A. When I was a patrolman I would go down to my  
12 neighborhood that had high trouble -- high criminal  
13 activity. And I talked to some of the residents, hey,  
14 what do you know out here.

15 Q. Okay.

16 A. Reach out to the residents and they'll tell me,  
17 like, so and so drives this vehicle, he's always coming  
18 in from Atascosa. Or there's a gambling room over here,  
19 or another agency would call and tell me hey, can you --  
20 we -- we suppose that vehicle might be involved in  
21 something.

22 Q. Okay. So how did that relate to this WhatsApp  
23 group?

24 A. It's -- it's just another source.

25 Q. A source of --

1 A. Of information.

2 Q. About -- and did you use the WhatsApp group --  
3 WhatsApp group when you're on the criminal interdiction  
4 unit?

5 A. Yes, I have.

6 Q. Okay. And tell me about it?

7 A. They just provide information.

8 Q. So WhatsApp to me is like a messaging app. Did  
9 you get messages then?

10 A. Yes.

11 Q. Did you only get messages through this group?

12 A. From that group, WhatsApp, yes.

13 Q. Okay. Did you ever have individual messages  
14 from individual officers from the group?

15 A. I would say Joseph Garza, but he's a deputy  
16 with us.

17 Q. Okay. So Deputy Garza was part -- Deputy  
18 Joseph Garza was part of that Northwest Highway Group?

19 A. Yes, ma'am. He knew people familiar with it  
20 and he was on it as well.

21 Q. Okay.

22 A. That's how I come to find out about it.

23 Q. Okay. So you found out about the Northwest  
24 Highway Group from Deputy Garza?

25 A. Yes, ma'am.



1 Q. What did you learn from Deputy Garza?

2 A. The same thing as always, that they provide  
3 information, possible smuggling.

4 Q. Okay. What kind of information?

5 A. Possible vehicles or possible subjects to look  
6 for.

7 Q. Okay. So you would get information on a red  
8 Toyota Camry?

9 A. Yes, ma'am.

10 Q. What other information would you get?

11 A. That's about it.

12 Q. Okay. Do you remember when you became part of  
13 the Northwest Highway Group?

14 A. I wasn't -- I would say I wasn't a part of it.  
15 I was just using them as a source of information.

16 Q. But in order to use them as a source of  
17 information, you had to become part of the group on  
18 WhatsApp; is that correct?

19 A. Yes, ma'am. I don't recall, honestly. I know  
20 I was using it for a very short time.

21 Q. Are you still part of the group?

22 A. No.

23 Q. Do you still use WhatsApp?

24 A. No.

25 Q. Do you know who the administrator of the

1       WhatsApp group was?

2             A.   No, ma'am.

3             Q.   When you joined the WhatsApp group, was there  
4       any process for becoming part of it?

5             A.   No, ma'am. We were just interdiction at the  
6       time and we told them they were interdiction deputies  
7       and we're always looking for sources or, you know,  
8       networking, we're always networking.

9             Q.   Okay. So I want to just, like, unpack that.  
10       So you downloaded WhatsApp onto your phone. Is that  
11       fair?

12            A.   Yes, ma'am.

13            Q.   And then you searched for, and I don't know, so  
14       I'm just asking you. Did you search for Northwest  
15       Highway Group?

16            A.   No, ma'am. When I found out about it, yes.

17            Q.   Okay. So when you found out about it, you  
18       downloaded WhatsApp?

19            A.   Yes.

20            Q.   Did you have WhatsApp before then?

21            A.   No, ma'am.

22            Q.   Okay. So you downloaded WhatsApp to become  
23       part of this Northwest Highway Group?

24            A.   Yes, ma'am.

25            Q.   Okay. So then you search for Northwest Highway

1 Group on WhatsApp. Is that how you found it?

2 A. Yes, ma'am. Well, I didn't search for it. I  
3 had to search for it and I don't remember who I talked  
4 to. It was just -- I know it was somebody in that  
5 group. And, hey, I'm an interdiction guy and then, you  
6 know, they provided information. And all it is with  
7 them was, hey, there's a vehicle, turnaround was really  
8 fast. That's it. That's what I remember recalling from  
9 it. It was up to us to develop, you know, the PC and  
10 all that stuff for it.

11 Q. Understood. I just -- I'm trying to  
12 understand, like, the mechanics of you becoming part of  
13 it. So it sounds like you messaged someone who was part  
14 of the group --

15 A. Yes.

16 Q. -- and said, hi, I'm Deputy Gereb.

17 A. Yes, ma'am.

18 Q. I work in criminal interdiction, and then they  
19 accepted you to be part of the group? Is that -- am I  
20 understanding this right?

21 A. I -- I believe so. I don't -- I really don't  
22 remember how that conversation went and I don't remember  
23 any of the names.

24 Q. There's okay. Did you have to do any -- did  
25 they check your identity or anything like that?

1           A. No. Because Deputy Garza was already a part of  
2           it and I believe Deputy Babb was as well --

3           Q. Okay.

4           A. -- and I think pretty much it was, like, kind  
5           of oh, he's doing his job.

6           Q. Okay. Cool. Have you ever heard of a law  
7           enforcement officer named Kiki?

8           A. Yes.

9           Q. Okay. Tell me about Kiki?

10          A. I really don't remember. I know a lot of the  
11          information from WhatsApp was coming from him.

12          Q. Did you know his name?

13          A. No.

14          Q. Do you know what entity he worked for?

15          A. I don't recall. There were so many different  
16          agencies on that group.

17          Q. Did you have any way of telling -- did you have  
18          any way of confirming that the people on the WhatsApp  
19          group were actually with a law enforcement agency?

20          A. From my knowledge, you were not to be on that  
21          group unless you were a law enforcement officer.

22          Q. Sure. I understand that. But did you have any  
23          way of verifying or checking?

24          A. No, ma'am.

25          Q. Have you ever heard of the Laredo Fusion

1 Center?

2 A. No, ma'am.

3 MS. HEBERT: What time is it?

4 MR. WINDHAM: 2:40.

5 MS. HEBERT: We've been going about an  
6 hour. Are you okay to take a break?

7 THE WITNESS: I'm good to keep going.

8 MS. HEBERT: Okay. Well, then we can keep  
9 going. Do you need a break? Okay, let's take a break.  
10 Sorry, I know that you're ready to go, but I thought I  
11 would just check to see if anybody needed to use the  
12 rest room.

13 THE WITNESS: I'm good to go but if you  
14 guys need a break I'm fine.

15 MS. HEBERT: I try to, like, remember to  
16 check every, like, hour or so.

17 So, 10 minutes everybody?

18 MR. FRIGERIO: We're off the record.

19 (Brief recess.)

20 Q. (BY MS. HEBERT) Okay. We're back on the  
21 record after a short restroom refresher.

22 And we're talking about the Northwest  
23 Highway Group before we took a break. You mentioned  
24 yourself, Deputy Joseph Garza and Deputy Babb, who are  
25 part of the Northwest Highway Group from Bexar County.

1 A. Yes, ma'am.

2 Q. Do you know anyone else who was part of it?

3 A. Not that I recall.

4 Q. Okay. Now I want to look at some exhibits, if  
5 that's okay. Do you remember when you surrendered your  
6 cell phones for forensic examination?

7 A. Yes, ma'am.

8 Q. And the cell phone examiner pulled certain  
9 records from your phone?

10 A. Uh-huh.

11 Q. We're going to look at some of those text  
12 message conversations. And they're identified with --  
13 by numbers. So we're going to look at the source of the  
14 conversation, your phone, someone else's phone, your  
15 personal phone, your work phone. And the number of the  
16 conversation you talked to. Is that all right?

17 A. Yeah.

18 Q. Okay. I'm going to start with what's been  
19 labeled "Gereb Personal Text - Conversation No. 9."  
20 We're going to label this Exhibit 85.

21 (Exhibit No. 85 was marked.)

22 Q. (BY MS. HEBERT) Take a chance to look at it.  
23 My understanding that neither of these messages is from  
24 you. When there's a message from you, from your phone,  
25 it will say something like local user.

1 A. Okay.

2 Q. And sometimes, it's in blue. It looks like to  
3 me, and you can tell me if I'm wrong, that neither of  
4 these messages are from you. Do you recall either of  
5 these messages?

6 A. No, ma'am.

7 Q. Okay. I have -- we have in our records that  
8 this first number is [REDACTED] 7815, and that's Deputy  
9 Molina. Does that seem right?

10 A. Yeah. Without looking at my phone, I believe  
11 so.

12 Q. Okay. And, Charles, if we need to, can Deputy  
13 Gereb get his phone to identify numbers?

14 MR. FRIGERIO: Sure.

15 MS. HEBERT: Why don't we take a two second  
16 break, just pause, and why don't you get your phone so  
17 we can identify things as you -- if you need to --

18 THE WITNESS: I know his number because  
19 he's the only one, and I know Max is his dog.

20 MS. HEBERT: That's okay. I mean, while  
21 we're taking a break why don't you do that, grab them so  
22 that if we need to look something up, you can.

23 (Brief recess.)

24 Q. (BY MS. HEBERT) We're back on the record.  
25 Deputy Gereb has gone and retrieved his cell phone so we

1 can look up numbers if we need to.

2 Do you know if this [REDACTED] 7815 is  
3 Deputy Molina?

4 A. Let me go through my personal phone.

5 Q. Sure.

6 A. Yes, ma'am.

7 Q. Okay. And this second number, [REDACTED] 0914.  
8 Do you know what number that is?

9 A. That's going to be Lieutenant Ortega.

10 Q. Lieutenant Ortega. And I know there are two  
11 Ortegases. This is Raymond Ortega?

12 A. Yes.

13 Q. Okay. So what I see in this conversation is  
14 Deputy Molina messaged "me and Max falling asleep out  
15 here waiting." Is that -- did I read that correctly?

16 A. Yes.

17 Q. And then Lieutenant Ortega messaged back "y'all  
18 good to clear Bucky, JZ out here if we need K9."

19 Did I understand that right?

20 A. Yes.

21 Q. To your knowledge and your memory, what is  
22 going on in this message?

23 A. I do not know. I don't recall. I don't want  
24 to speculate as to what's going on. But what I'm  
25 understanding is that Lieutenant Ortega cleared Deputy



1 Molina, I guess, for the day. And JZ is a -- is a  
2 nickname of another K-9.

3 Q. Okay. So there's another K-9 unit named -- or  
4 is that an officer?

5 A. Yes, it's a deputy.

6 Q. Okay. So Deputy JZ for the -- what is Deputy  
7 JZ's real name?

8 A. Joseph Garcia.

9 Q. Joseph Garcia. Did we talk about Joseph Garcia  
10 attending the criminal interdiction conference?

11 A. Yes. Yes.

12 Q. So Deputy JZ, also known as Deputy Joseph  
13 Garcia, was the gentleman who attended the 2021 Motor  
14 Vehicle Criminal Interdiction Conference?

15 A. Yes, ma'am.

16 Q. Okay. And Bucky, that refers to Molina?

17 A. Yes, ma'am.

18 Q. Okay. So it seems like Lieutenant Ortega gave  
19 Bucky -- Deputy Molina permission to leave?

20 A. Yes, ma'am.

21 Q. And you were on this text message chain too.  
22 Looks like the date on these messages is 10/25/2023. Do  
23 you remember what you were doing that day?

24 A. No, ma'am.

25 Q. But the criminal interdiction unit was still

1 functioning. Is that fair?

2 A. Yes, ma'am.

3 Q. Okay. Let's flip to Exhibit K.

4 (Exhibit No. 86 was marked.)

5 Q. (BY MS. HEBERT) We're going to mark this  
6 Exhibit 86. And this is from your personal phone,  
7 "Gereb Personal Text - Conversations No. 17" by the  
8 forensic examiner. Take a second to review the  
9 document.

10 A. Yes, ma'am.

11 Q. Are you ready?

12 A. Yes.

13 Q. I see the same number here for Deputy Molina.

14 Do you see that?

15 A. Yes, ma'am.

16 Q. Okay. And it looks like Deputy Molina texted  
17 you. And he asked, "Hey bro do you want the  
18 interdiction kit?"

19 Am I reading that right?

20 A. Yes, ma'am.

21 Q. What is an interdiction kit?

22 A. So it's a toolbox. Basically it's got a scope,  
23 it's got, I believe, density reader.

24 Q. What's an density reader?

25 A. A density reader is -- it's basically like a

1 stud finder. So you -- you can put it up next to a tire  
2 or a part of a vehicle or a wall or whatnot and you can  
3 tell if something is standing out.

4 Q. Okay. And you mentioned the scope previously.  
5 What's a scope?

6 A. It's same thing as like I call it a  
7 Roto-Rooter. You can put it in the gas tank or down an  
8 air conditioning vent and see if there might be  
9 something involved in there.

10 Q. Okay. So it's something that allows you to see  
11 inside?

12 A. Yes, ma'am.

13 Q. So we've got a scope. We've got a density  
14 reader. Anything else in the interdiction kit?

15 A. That's all I recall.

16 Q. Okay. Do you still have an interdiction kit  
17 today?

18 A. I never got it. I never -- I never retrieved  
19 it.

20 Q. Okay. So Deputy Molina had an interdiction kit  
21 but you never got one?

22 A. The K-9 guys usually had one.

23 Q. Okay. And why is that?

24 A. I don't know.

25 Q. Sure.

1 A. That was always something before me.

2 Q. Okay. And I'm going to go to what's previously  
3 been marked Exhibit 64.

4 MS. HEBERT: And in our booklet,  
5 Mr. Windham, that is Exhibit D. And we're going to mark  
6 this again as Exhibit 64 for consistency. We're also  
7 simultaneously going to look at another exhibit,  
8 Exhibit L from our list, and we'll mark this 87.

9 (Exhibit No. 64 was previously marked.)

10 (Exhibit No. 87 was marked.)

11 MR. WINDHAM: You're good. I like that you  
12 called this a booklet. All right, where are we?

13 MS. HEBERT: Exhibit L. We're going to  
14 mark that 87.

15 MR. WINDHAM: Okay.

16 Q. (BY MS. HEBERT) Okay. Do you have both 64 and  
17 87?

18 A. Yes, ma'am.

19 Q. Okay. Do you see what's been marked "Gereb  
20 Personal Conversation No. 19", that's Exhibit 64, and  
21 "Gereb Personal Text - Conversation No. 20" which is  
22 Exhibit 87?

23 A. Yes, ma'am.

24 Q. Okay. There's a couple of numbers here that I  
25 just want you to help me identify. Do you see the first

1 one. I think we might have already identified this one  
2 before, let's just make sure. This [REDACTED] 0914, we  
3 previously identified that as Lieutenant Ortega; is that  
4 right?

5 A. Yes, ma'am.

6 Q. Okay. So the first one is Lieutenant Ortega.  
7 Can you just write that on the exhibit?

8 A. Can I have a pen?

9 Q. Yeah. How about you borrow mine. And I have  
10 plenty.

11 The next one, [REDACTED] 2695.

12 A. I'm going to go to my personal phone.

13 Q. That's okay.

14 A. That's going to be Deputy Jason Garcia.

15 Q. Jason Garcia.

16 A. He's a -- street crimes and SWAT.

17 Q. There's a lot of like J. Garcia. JG names.

18 A. Yes.

19 Q. Okay. And then the next number is the -- no,  
20 not the same one. [REDACTED] 2685. Do you know who that  
21 is?

22 A. Yes, that's going to be Sergeant Sanchez.

23 Q. Sergeant Sanchez?

24 A. He's a street crimes and SWAT sergeant.

25 Q. Okay. And then looking at the other exhibit,

1 Exhibit 64, I see the same number Sergeant Sanchez,  
2 Sergeant Sanchez?

3 A. Yes.

4 Q. Would you mind writing it on there?

5 A. (Witness complies.)

6 Q. It's just helpful to have it.

7 So I want to look at the dates of these two  
8 conversations. 7/17/2023 and they're all in the same  
9 time period. It seems like this is actually part of one  
10 conversation but got split by the examiner. I'll just  
11 say that to you. That's what it seems like to me.

12 Let's take a look at the first in time  
13 text, which would be 19:40:10, the first text on  
14 Exhibit 87. I see that as saying "If it don't say SCU  
15 you can't wear them."

16 What is -- what is that about? Do you  
17 know?

18 A. So we -- the street crimes unit and gang unit  
19 had different patches. So theirs will be a subdued  
20 patch, like, similar to this one. But on the bottom in  
21 the triangle right here will say "SCU" or "street crimes  
22 unit" and then -- or it will say "gang."

23 Q. Okay.

24 A. And the patch at the time, I wore green.

25 Q. You wore a green?

1 A. A green Velcro patch.

2 Q. On -- on your shoulders?

3 A. Yes.

4 Q. Okay. And what was your green Velcro patch  
5 for?

6 A. Just a different color patch for the  
7 interdiction unit.

8 Q. Okay. So the interdiction unit had its own arm  
9 patches in addition to its -- on the chest patch that  
10 said criminal interdiction?

11 A. Yes, ma'am.

12 Q. Okay. And what did the criminal interdiction  
13 patch unit look like. It's just green?

14 A. Just a green version of this.

15 Q. Okay. And what did Lieutenant Ortega mean by  
16 "If they don't say SCU, you can't wear them, emoji  
17 face"?

18 A. It means that they don't say SCU on it, then  
19 you're not authorized to wear the patch.

20 Q. Got it. Okay. The next one from -- I think  
21 that was Jason Garcia, Deputy Garcia, "No, sergeant,  
22 those are not authorized. Quit being a cheapo."

23 Do you know what that was about?

24 A. I know that there was a patch that was out  
25 there that the gang unit had. That -- that wasn't

1 authorized.

2 Q. Oh, they were wearing their own like --

3 A. Their own little -- their own little patch.

4 The chief didn't approve of it. So that's when they --  
5 they actually went back to the board and said, okay,  
6 we'll put SCU or gang on the bottom. That's -- that's  
7 my understanding of that. The SWAT guys have also had  
8 different patches over the years. It's all been the  
9 same. But there's been different -- differences in  
10 between them.

11 Q. I got it. So then it looks like Sergeant  
12 Sanchez replies, "Why do we want two different patches?"

13 And he's talking about the SCU patch versus  
14 the gang unit patch. Is that fair?

15 A. I think -- I think it has to do with the fact  
16 they go back and forth between their SWAT patch and the  
17 SCU patch.

18 Q. Okay.

19 A. Because when they're on SWAT duties, they have  
20 to wear the SWAT patch.

21 Q. Got it. What does the SWAT patch look like?

22 A. It's -- it'll basically say this but it will  
23 say SWAT on it and it will have an eagle with a  
24 lightning bolt.

25 Q. Okay.



1 THE REPORTER: An eagle with what?

2 THE WITNESS: A lightning bolt.

3 Q. (BY MS. HEBERT) And then it looks like  
4 Sergeant Sanchez says, "Too many patches." Just kind  
5 of, you know, and by that he means there's too many  
6 different patches. Is that fair?

7 A. Yes.

8 Q. Can we look at Exhibit 64?

9 A. Yes, ma'am.

10 Q. It looks like Sergeant Sanchez says "We are all  
11 Zulus. It doesn't need to say SCU or gang or  
12 interdiction".

13 What's a Zulu?

14 A. That's our call -- that's the call signs.

15 Q. Tell me more?

16 A. So organized crime, when you're part of a  
17 different unit, you're not a part of patrol, you get  
18 your own call sign. So we identify ourselves -- at the  
19 time when this was out, I was known as 5 India 11.

20 Q. We talked about that before?

21 A. So it's -- 5 I 11.

22 Q. Yeah.

23 A. And then the Zulus, basically which is 5 Zulu 1  
24 through 100. It can be whatever your call sign is.

25 Q. What is your call sign now?

1 A. 5 Zulu 92.

2 Q. 5 Zulu 19.

3 A. 92. 92.

4 Q. 92. Excuse me. 92, 5 Zulu 92.

5 And I guess then was -- were you  
6 understanding Sergeant Sanchez to be messaging the whole  
7 group or was he just messaging you personally?

8 A. No, I believe he was messaging the whole group.  
9 It doesn't matter. We're all -- we're all a team.

10 Q. Yeah, and I was -- I guess I was just trying to  
11 confirm whether you agree that Sergeant Sanchez's  
12 messages were part of this original conversation 20 or  
13 was he sending you separate messages on the side?

14 A. According to this -- no, I believe it was part  
15 of that group.

16 Q. Okay. I'm just asking what you thought, too.

17 So it looks like Sergeant Sanchez responded  
18 to the group by saying "We're all one team"?

19 A. Yes.

20 Q. And he's saying that it doesn't need to say  
21 street crimes unit or gang unit or interdiction unit.  
22 We're all just one team?

23 A. Yes, ma'am.

24 Q. Okay. And then it says, the next message, and  
25 this is Sergeant Sanchez again "Since I supervise four

1 units can I get SCU gang K-9 interdiction on mine."

2 Does Sergeant Sanchez supervise all four of  
3 those units or at least at the time of July 2023?

4 A. No, ma'am. So sometimes when supervisors are  
5 off they'll pick up the slack for the other supervisor.  
6 And Sergeant Sanchez is usually in the field with  
7 everybody and whenever Sergeant Gamboa is off or he's  
8 tied up with whatever he has to do as Sergeant  
9 Sanchez -- at the time I would report to Sergeant  
10 Sanchez.

11 Q. Got it. That's helpful. I didn't understand  
12 that. Okay. Thanks for walking through that with me.

13 We'll look at another conversation. M and  
14 N from our stuff. This is, again, two conversations  
15 that we're going to group together. I'm going to mark  
16 this 88 and 89.

17 (Exhibit Nos. 88-89 were marked.)

18 MR. WINDHAM: What are the numbers?

19 MS. HEBERT: 21 and 22.

20 MR. WINDHAM: Just making sure. That fell  
21 out.

22 MS. HEBERT: 88 is 21 and 89 is 22.

23 MR. ELLSWORTH: Did y'all get --

24 THE WITNESS: I didn't get --

25 MR. ELLSWORTH: They're together? Oh, I

1 guess they're part of the same.

2 And do you have one sheet there?

3 MS. HEBERT: We need to mark it.

4 THE WITNESS: Do you need to mark it?

5 MS. HEBERT: Yep, we need to mark it.

6 MR. WINDHAM: No, my point is that 88 has  
7 two pages.

8 MS. HEBERT: Oh, okay. Mine is front and  
9 back.

10 MR. WINDHAM: So now we're on 89.

11 Q. (BY MS. HEBERT) Good spot. Take a chance --  
12 take a second to review all this. Let me know when  
13 you're ready.

14 A. Okay.

15 Q. Okay. Let's walk through and identify some of  
16 these numbers again. We'll start with "Conversation  
17 21." This blue is you, so we know that that's from you.  
18 Can we start with [REDACTED] 7624?

19 A. This is going to be Deputy Richard Calderon  
20 with street crimes and SWAT.

21 Q. Richard Calderon.

22 A. Calderon.

23 Q. You're going to have to spell that for our  
24 court reporter. I'm pretty sure.

25 A. C-A-L --

1 Q. C-A-L --

2 A. D as in dog, E-R-O-N.

3 Q. Okay. And then the next number, [REDACTED]  
4 [REDACTED] 6649?

5 A. That's Deputy Ruben Morales.

6 Q. Morales, is that what you said?

7 A. Yes, ma'am. He's street crimes and SWAT.

8 Q. This next number, I feel like we already  
9 identified.

10 A. Sergeant Sanchez.

11 Q. Sanchez. And then there's you again. And then  
12 it looks like Sergeant Sanchez again?

13 A. Yes, ma'am.

14 Q. Sergeant Sanchez again?

15 A. Next three are Sergeant Sanchez.

16 Q. Okay. I'll just group that whole thing, then.  
17 And then I see you. Do you know who the next number is?  
18 That's Deputy Calderon?

19 A. Yes, ma'am.

20 Q. You again. The 9 number I don't know. [REDACTED]  
21 [REDACTED] --

22 A. That's Deputy Morales. Up top.

23 Q. Oh, okay. Thank you. This 5 number is Sanchez  
24 again?

25 A. Yes, ma'am.

1 Q. And Sanchez again?

2 A. Yes, ma'am.

3 Q. We'll flip over to the back or to the next  
4 page. Is that Sanchez again?

5 A. Yes, ma'am.

6 Q. Sanchez again?

7 A. Yes, ma'am.

8 Q. And that's you. And then Sanchez again?

9 A. Yes, ma'am.

10 Q. And then it looks like the conversation No. 22,  
11 Exhibit 89, is that Sergeant Sanchez?

12 A. Yes, ma'am.

13 Q. Okay. Same thing as the last two exhibits we  
14 looked at. The Exhibit 21 or "Conversation 21" and  
15 "Conversation 22," Exhibits 88 and 89 are at the same  
16 date and almost, like, the exact same time. Looking at  
17 Conversation 22, Exhibit 89, it's 6/9/2023, 15:32. It  
18 would be like 3:30 by my understanding. Is that fair?

19 A. Yes, ma'am.

20 Q. Okay. And in looking at these messages, I just  
21 wanted to, like, even if it's temporally, I would want  
22 to see, like, where it would fall. So 6/9 15:32:02.  
23 Where would that fall? That would fall --

24 A. At 3:32:02.

25 Q. So would that fall right after "okay Babby,"

1 the message on 88, Exhibit 88, the next page? I'm just  
2 trying to temporally date it.

3 A. I believe so. It could go in between.

4 Q. Sir, do you think -- I'm just asking for your  
5 opinion here. It doesn't really matter either way. Was  
6 this -- was this Conversation 22, Exhibit 89 part of the  
7 Conversation 21, Exhibit 88, or was it a standalone  
8 message?

9 A. I want to say -- I want to say it's standalone,  
10 probably.

11 Q. Okay. Okay. So potentially standalone message  
12 for 89.

13 Can we talk a little bit about what's  
14 happening in Exhibit 88?

15 A. Yes, ma'am.

16 Q. The first message that we have here is "I still  
17 got PC before the stop LOL."

18 Do you recall sending that message?

19 A. Yes, ma'am.

20 Q. What was -- what was that in reference to?

21 A. So some of the -- I'm going to briefly over  
22 this, the whole thing.

23 Q. That's okay. If you want to give me the  
24 general gist, like, just tell me what's going on here?

25 A. So some -- basically just guys razzing -- being

1 guys, you know, group, guys are just poking the bear at  
2 each other. That's just pretty much what is going on.  
3 But this right here, you know, at their brief and all  
4 that, I like to get my own PC. We all have UCs, which  
5 our peace officers, they can give us PC. But I always  
6 tell them I like my own. I've always -- I've always  
7 liked my own because it looks better, because I can  
8 attest to what I saw.

9 Q. Understood.

10 A. That's always been my thing. Oh, that's pretty  
11 much on that first --

12 Q. So that's what you're saying here, is you're  
13 not going to rely on an undercover agent's probable  
14 cause. You're going to develop your own?

15 A. I always try to -- like I said I'm not -- I  
16 always do my best to get my own, and that's probably  
17 99.999 percent of the time.

18 Q. Okay. And why -- what did you understand  
19 Deputy Calderon to be saying when he said "Damn.  
20 Babb and Gereb are gonna" excuse me. What did you  
21 understand when you saw that Deputy Calderon said "Damn.  
22 Babb and Gereb both gonna be on the news"?

23 A. I believe that this is a reference to after the  
24 YouTube video came out referencing Deputy Babb's traffic  
25 stop.



1 THE REPORTER: Referencing what?

2 THE WITNESS: Deputy Babb's traffic stop.

3 Q. (BY MS. HEBERT) And then Deputy Morales said  
4 "This sounds dangerously like making quotas."

5 What is that about?

6 A. So there's always been that argument about cops  
7 are always out to get quotas. They always have to have  
8 a certain number. And, you know, we have never operated  
9 on that.

10 Q. Okay. And then Sergeant Sanchez replied, "Ya,  
11 okay Babb. Mam, the only reason I stopped you is  
12 because we following a wp who I thought was you...even  
13 though you came out of your own driveway and not the  
14 wps"?

15 A. That says I don't recall why he referenced that  
16 one.

17 Q. Okay.

18 A. But he was calling me Babb.

19 Q. Why was he calling you Babb?

20 A. In -- again, making reference to the video of  
21 me being part of the interdiction unit.

22 Q. Okay. And I mean you talked about guys razzing  
23 each other. Why would that be funny? Like, what's the  
24 joke there?

25 A. I believe at this time Babb was no longer a

1 part of the interdiction he was at the training academy.

2 Q. Okay.

3 A. And it was just me at the time. I'm sorry, I  
4 think --- I don't know if we picked up my -- at the time  
5 Deputy Estrada which was now my former partner again.

6 Q. Right.

7 A. We don't -- I don't remember if we picked him  
8 up yet at time or not.

9 Q. Okay. That's neither here nor there.

10 Why would calling you Babb be any kind of  
11 joke or teasing?

12 A. It's because I'm the last one in the  
13 interdiction unit. I'm always defending us. And, you  
14 know, I'm always like, hey, this is -- this is, you  
15 know, what we do. I'm always, in the sense, defending.

16 Q. Okay. So was that what Deputy Babb used to do?

17 A. I don't know how Babb did his training stuff.

18 Q. No, no, I'm not asking that.

19 A. Okay.

20 Q. I'm just asking you like why -- they -- why  
21 were they calling you Babb?

22 A. It was just an insult. Again, it goes back --

23 Q. It is an insult. And why were they insulting  
24 you?

25 A. It goes back to the YouTube video.

1 Q. Okay. So they were insulting you about -- I  
2 mean, being in the YouTube video isn't of itself  
3 insulting so I guess I don't understand the joke or the  
4 insult?

5 A. So in a sense, not many people agree with the  
6 way interdiction works, because it's a -- it's a  
7 different -- in a sense almost a different style of  
8 traffic stop, it's a more investigative versus a regular  
9 traffic stop, you walk up. Hey, I smell weed, get out  
10 of the car and let's talk, and then you go -- you go  
11 from there. It's more identifying things. It's more of  
12 understanding, you know, mindset and criminal behavior  
13 and, you know, the long -- the long term of  
14 investigation of it and how fast it can go from a  
15 traffic stop to a full on investigation.

16 So that -- that's usually a difference  
17 between an interdiction stop and a typical traffic stop.

18 Q. Got it. What did WP mean?

19 A. Wanted person.

20 Q. Okay.

21 THE REPORTER: What was it?

22 THE WITNESS: Wanted person.

23 Q. (BY MS. HEBERT) The next response is you,  
24 "Shoot I know where the line is im the sand", and I  
25 think that was a typo. Did you mean in the sand? Is

1       that fair?

2           A.   Yes.

3           Q.   What were you saying there?

4           A.   I just know where to draw the line.

5           Q.   What line?

6           A.   I -- I don't -- so I guess the line in the sand  
7       is I don't cross the line. I don't try to be -- do any  
8       more that's not supposed to be done.

9           Q.   And what line are you referring to here?

10          A.   In this -- in this context, I don't go off of  
11       what other PC is. It can be sometimes not  
12       appropriate -- not the right PC, and that's why I always  
13       go from mine. I know where to draw and what I'm gonna  
14       do it. How I'm going to do things. I'm going to do  
15       things my way.

16          Q.   Sure. And the next message from you is 9/10 we  
17       "never catch the wp" and we understand that to be wanted  
18       person?

19          A.   Yes.

20          Q.   What were you referring to there?

21          A.   I don't remember. It could be the reason why  
22       we were on the -- if we were working -- I don't recall  
23       the reason for that one.

24          Q.   Okay. And I see Sergeant Sanchez responded, "I  
25       see you tattlet telling." What was that about?

1           A. I don't remember. I guess he's calling me -- I  
2 guess in a sense a five-year old tattletale. I  
3 don't -- I don't recall.

4           Q. Who were you tattletale telling to at that point?

5           A. Nobody. Again, it's just him poking the bear.

6           Q. Okay. The next message is also from Sergeant  
7 Sanchez; "The UCs said it was the wp and I found I mean  
8 I made up pc."

9                       Did I read that correctly?

10          A. Yes.

11          Q. As I understand that and I'm just going to  
12 unpack some of those words, the undercover said it was  
13 the wanted person. And I found, I mean, I made up  
14 probable cause.

15                      Did I understand that correctly?

16          A. Yes.

17          Q. Okay. And understanding those -- those words  
18 together, it seems like Sergeant Sanchez, whether it's a  
19 joke or not was saying the undercover agents pointed to  
20 someone as the wanted person and he was joking or saying  
21 that he found and he made up PC. He was joking about I  
22 didn't actually find it but I made up the probable  
23 cause?

24          A. Yes, ma'am.

25          Q. Did you ever hear about Sergeant Sanchez making

1 up probable cause?

2 A. No, he was -- he was actually making a joke.  
3 So a lot of these jokes are in reference to that YouTube  
4 video.

5 Q. Okay.

6 A. That's where a lot of the -- they've always  
7 razzed me over that, because of that YouTube video.

8 Q. Okay. So Sergeant Sanchez was referring to the  
9 YouTube video in this message?

10 A. I believe so.

11 Q. So he -- so is he saying in a joke or otherwise  
12 that what happened in the YouTube video that followed  
13 the traffic stop in this case, there's someone some  
14 undercover person said it was a wanted person and that  
15 Deputy Babb found, I mean made up, probable cause, is  
16 that the joke?

17 A. Again, I don't want to assume.

18 Q. And I'm not asking you to assume.

19 A. I'm not -- I don't recall.

20 Q. I'm asking you what -- what you understood.  
21 What did you understand that to be?

22 MR. ELLSWORTH: Objection, asked and  
23 answered.

24 MS. HEBERT: He didn't give me what he  
25 understood.

1 MR. ELLSWORTH: He said he doesn't recall.

2 MS. HEBERT: He said he doesn't want to  
3 speculate about what Sanchez was going to -- was  
4 meaning. But he can give me his understanding of the  
5 joke.

6 THE WITNESS: Again, it's in reference to  
7 the video.

8 Q. (BY MS. HEBERT) Okay.

9 A. Yeah, it's in reference to -- a lot of -- a lot  
10 of -- since that video came out, a lot of people  
11 questioned the interdiction unit at the time.

12 Q. Understood. And then it looks like Sergeant  
13 Sanchez says "Eeeeeeeeeee."

14 Do you know what that --

15 A. It's just like -- it's just being slang, like  
16 Eeeeeeeeeee, you know, talking crap what are you going to  
17 do about it, you know. That's kind of -- that's kind of  
18 what it means.

19 Q. It's like a laugh?

20 A. Yes, in a sense.

21 Q. Okay. The next message is you, "They need to  
22 make machine guns and Ruiz bifocals."

23 I'm going to guess that "amd" is "and."

24 Was that a typo?

25 A. Yes, I am very bad at texting.

1 Q. That's okay, so am I. Is Machine Guns a  
2 person?

3 A. Yes.

4 Q. Okay. And Ruiz, is Ruiz a person?

5 A. Yes, ma'am.

6 Q. Okay. So you're saying, in this message, they  
7 need to make Machine Guns and Ruiz bifocals?

8 A. Yes, ma'am.

9 Q. You're joking about something there?

10 A. Yes. So they're -- they're older and  
11 they're -- sometimes they -- they confuse things over.  
12 Like they'll say -- they'll confuse a Dodge Challenger  
13 with a Dodge Charger. You know, so they'll -- they'll  
14 just get things confused. And I always tell them, like,  
15 hey, you guys are old. I'll go up to their face and  
16 say, hey, make old person jokes.

17 Q. So you're like changing the topic and throwing  
18 the shade on someone else?

19 A. Yeah, I'm trying to scapegoat.

20 Q. I understand. The next message is Deputy  
21 Calderon, "Get 'eh off you Gereb."

22 What was -- what did you understand Deputy  
23 Calderon to be saying?

24 A. Get them off of you. Like get them to stop.  
25 Stand up for yourself. And usually, I'm one of those, I



1 can roll with the punches.

2 Q. Yeah. And so he was like cheering you on?

3 A. No, not necessarily. He's just -- he's just --  
4 adding fuel to the fire.

5 Q. Okay.

6 A. That's what's going on.

7 Q. And then the next message is from you, "nah I  
8 need my pc on dash remember."

9 Did I read that right?

10 A. Yes, again, typo it was supposed to say I need  
11 my PC.

12 Q. On your dash. So you're saying -- you're  
13 responding to their jokes by saying no, you try to get  
14 probable cause captured on your dash cam. Is that fair?

15 A. Yes.

16 Q. This next message from Deputy Morales. "Blow  
17 the whistle Gereb."

18 Do you know what this joke is about?

19 A. He's calling me a whistleblower.

20 Q. For?

21 A. He's trying to say that, again, it goes into  
22 the reference of -- back to the YouTube video.

23 Q. Okay. And I guess I don't understand how that  
24 connects with the YouTube video, because the YouTube  
25 video isn't, like, necessarily about a whistleblower.

1 So help me understand?

2 A. So a lot of the issue that came from the video  
3 puts us -- at the time was putting us in lot of  
4 questions with some of our guys. Meaning that they were  
5 always questioning how we did things. And I always told  
6 him I always played fair. Meaning that if I -- I do my  
7 best to get everything on video. I do my best to do  
8 everything right. I'm not going to -- I've always been  
9 kind of like almost in a street crime form on the  
10 highway. If I see it I see it, and if I don't I don't.  
11 And I leave it that.

12 I've -- I've always done tried different  
13 ways of doing interdiction and I've always -- and see  
14 what works for me and what doesn't work for me. And so  
15 he told me a whistleblower again, he's trying to say  
16 that I knew something about the whole video and the  
17 whole incident with Babb and all that stuff.

18 Q. I get it. He's joking that, like, you were the  
19 one that called the whistle on Deputy Babb?

20 A. No, he's trying to say that, you know, put all  
21 the information about Babb, put all the stuff out. And  
22 I'm like I don't know.

23 Q. Okay. Sure. And the next message is from  
24 Sergeant Sanchez again. "See, there it is, Gereb. I  
25 knew you would break...threw Z17 and 16 under the bus."

1 Who is Z17 and 16?

2 A. This can be Machine Gun and Ruiz.

3 Q. Okay.

4 A. That's their call signs.

5 Q. And what's Machine Gun's real name?

6 A. John Rodriguez.

7 Q. John Rodriguez. Okay.

8 What's -- who is Ruiz?

9 A. He's also another member part of the undercover  
10 unit.

11 Q. What's his first name?

12 A. Ray.

13 Q. And then there's Sanchez making his "Eeeeeeeee"   
14 noise again?

15 A. Yes.

16 Q. And then Sanchez said "Okay Babby" and then   
17 looks like Sanchez is making fun of you over the next   
18 message "Gereb what is meed" for a typo; is that   
19 correct?

20 A. Yes.

21 Q. And your response is, "Nah I have my style   
22 which is not a 4th amendment violation."

23 Did I get that right?

24 A. Yes.

25 Q. And then Sanchez responded to that "Sounds like

1 a combination of made up and need."

2 What did you understand Sanchez to be  
3 saying there?

4 A. Oh, he's just trying to -- because I have a  
5 speech problem. Sometime this is moving faster than  
6 this. And sometimes I mumble, and it will come out  
7 basically unreadable sometimes, for lack of a better  
8 term. And there's been times on the radio that I try to  
9 put relay information and I'm so excited -- the  
10 excitement's there that, you know, it comes out, you  
11 know, not understandable.

12 Q. Understood. So you like, kind of squished  
13 words together?

14 A. I guess in a sense. I'm thinking it sounds  
15 right in my head but this is not saying it right.

16 Q. I get it. Okay. Let's look at Exhibit 89. It  
17 looks like Sergeant Sanchez messaged you, "Bet your dash  
18 didn't catch it. Sounds right for interdiction  
19 deputies."

20 What was Sergeant Sanchez talking about  
21 here?

22 A. I assume this is in reference, again, to the  
23 incident of with Babb.

24 Q. Okay. He messaged just you at that time?

25 A. I don't remember. I don't know if I reached

1 out to him or the other way around. I don't recall.

2 But I know it's in reference to the incident with Babb.

3 Q. Okay. And it seems like Sergeant Sanchez is  
4 saying that interdiction deputies didn't catch things on  
5 their dash cam often. Is that fair?

6 A. No.

7 Q. Okay. Tell me more.

8 A. Again, he's only going off of the incident with  
9 Babb. So, again, that -- that incident brought in a lot  
10 of speculation from other deputies in -- that weren't  
11 there or -- that don't see us, how we do our thing. And  
12 we're not always going to catch traffic stops always on  
13 our cam. Even though we do our best. If we're on the  
14 highway, it is sometimes very hard to get it on the  
15 camera because of how we face.

16 For instance, I could be facing sideways --

17 Q. Sorry, say that again. You were saying your  
18 dash cameras don't always capture the traffic violation.  
19 Tell me more?

20 A. So if we're seeing -- the way sometimes we sit  
21 on the highway it's a big grassy median, say on 35 south  
22 going towards Atascosa County, we -- we can -- we can  
23 face sideways and we can turn our body and face and see  
24 traffic. I've always tried to if I can position my  
25 vehicle to where I can see the traffic violation but at

1 times that does make it difficult to get turned around  
2 and get out and try to catch up to the vehicle.

3 At times we face sideways and the vehicles  
4 will go by us and we see the traffic violation but it's  
5 not caught on camera. So hence why I always -- I always  
6 attempted to try to get a second violation as well.

7 Q. Understood. So let me just understand what  
8 you're saying about facing. So which direction would  
9 you face -- how would you face your patrol car if it  
10 were trying to capture the traffic violation on the  
11 camera?

12 A. So I'd face it facing traffic.

13 Q. So would that mean -- we can -- do you have a  
14 piece of paper?

15 MS. HEBERT: Josh, can I have a piece of  
16 paper? You can use that blue piece of paper. That's  
17 fine.

18 Q. (BY MS. HEBERT) I'm going to mark this as  
19 Exhibit -- what exhibit are we on?

20 THE REPORTER: 90.

21 MS. HEBERT: 90.

22 (Exhibit No. 90 was marked.)

23 Q. (BY MS. HEBERT) All right. I'm going to make  
24 a number one here. Can you help me what would it look  
25 like when you're trying to capture --

1 A. I'll draw a diagram.

2 Q. Yeah, that's great. Don't use the whole page  
3 because we're going to have --

4 A. Questions.

5 Q. -- multiple, because you talked about different  
6 places you would have --

7 A. Only two places I do it like that.

8 Q. Okay.

9 A. So I'm going to typically mark 35 south by  
10 Atascosa.

11 Q. Okay. And I see that you've drawn the north  
12 and the south. Is that fair?

13 A. Yes, I'm going to mark them north and south.

14 Q. Okay. I'm not sure I know what that says. Is  
15 that north highway?

16 A. North I-35 south, all these are northbound  
17 lanes.

18 Q. Got it.

19 A. Okay. So if this is the grassy median, so it's  
20 got that big grassy area. So sometimes if I can, I'll  
21 face my vehicle in that grassy median. I'll put the F  
22 in front of the vehicle and R as the rear.

23 Q. Sure.

24 A. Facing -- facing traffic, this way going  
25 northbound.

1 Q. And -- and which way is the traffic going on  
2 the northbound. Can you draw me an arrow? So you're --  
3 you're facing -- as traffic is coming with -- toward  
4 you?

5 A. Yes. So I can see traffic going this way and I  
6 can see traffic going that way.

7 Q. Got it.

8 A. And then if I -- if -- that's just -- that's to  
9 try to get the -- a good view without hurting my neck  
10 and try to get hopefully get it on camera of a traffic  
11 violation committed by someone.

12 Q. Understood.

13 A. There's also the way --

14 Q. Draw a number one on that car so we just know  
15 which one you're talking about. Okay.

16 A. Okay. There's also the way -- so you can see  
17 sideways.

18 Q. You just drew two more vehicles, number two and  
19 number three, and both of them you labeled the front and  
20 rear, so you -- how you park them otherwise?

21 A. Yes. This is facing sideways, which the camera  
22 will not capture the traffic violation. So at that  
23 point, you'll be seeing sideways. And you'll see with  
24 your eyes but the camera unfortunately won't see it. So  
25 at that point, you know, it makes it harder to capture



1 probable cause -- PC for the stop. Makes it harder to  
2 capture on camera because, again, you're sitting  
3 sideways and it's out of the view of the camera.

4 Q. I understand.

5 A. So that -- those are the ways of doing it on  
6 the highway. That's --

7 Q. And would you try to position your vehicle in  
8 position No. 1?

9 A. I always try to. And I always, again,  
10 that's -- I always try many different ways. If I can do  
11 it, I'll do it.

12 Q. Okay. Would you do positions two and three?

13 A. Yes.

14 Q. And when would you do positions two and three?

15 A. Just whenever I felt like doing that day.  
16 Whatever I felt like trying, whatever I felt like  
17 working with.

18 Q. Okay.

19 A. So -- and, again, it's -- it really depends,  
20 too, I always look at the flow of traffic. How fast is  
21 the traffic going, am I going to be able to get out  
22 enough to catch up to the vehicle.

23 Q. Have you ever heard of using the -- the way  
24 that you've positioned your vehicle for two and three,  
25 using your -- your vehicle as a billboard when you're

1 doing positions two and three?

2 A. I've heard -- there has been a billboard on two  
3 and three because the card says, perhaps sheriff on it  
4 in big round letters and it that's got a big old brown  
5 and gold stripe on it and it's got vehicle number,  
6 lights, and all that stuff. So when somebody see it,  
7 there's sometimes there's typically a reaction to it.  
8 And I can tell -- that's -- I've seen it -- I've been on  
9 the highway where I'm driving home, and I see someone  
10 scooting over and they'll look at me and scoot over  
11 again.

12 So I'll scoot over and then they'll scoot  
13 over. And it's -- at the point they commit a traffic  
14 violation. Because they're so worried about me and  
15 what's -- my car that their reactions they're not paying  
16 attention to traffic, they commit a traffic violation  
17 and I'll hit them on a traffic violation.

18 Q. Got it. Would you say that there was a  
19 position one, two, or three that you did most often?

20 A. No, no, I just mix it up. Sometimes I mix them  
21 up during the day. I'll hit one one way and then I go  
22 face it the other way and then I'll go face it the other  
23 way. And then I'll -- it just depends. On what I  
24 filled out at the time was a very good position.

25 Q. Understood. Did the sheriff office have any

1 roles on which position or how you should position your  
2 car?

3 A. No, ma'am.

4 Q. And has the sheriff's office issued any other  
5 rules today about how you should position your patrol  
6 car?

7 A. No, ma'am.

8 Q. Okay. You can put that to the side. Thank you  
9 for your amazing drawing skills and narrating through  
10 all that.

11 A. Do you need any of these?

12 Q. I don't think so. I think we can put them to  
13 the side, too.

14 Let's look at Exhibit O.

15 (Exhibit No. 91 was marked.)

16 Q. (BY MS. HEBERT) My colleague is handing you  
17 what's been marked Exhibit 91. And I'll represent this  
18 is from your work phone at the time. This is labeled as  
19 Conversation 2." Before we move on, I just -- I have a  
20 question for you. What -- can you tell me the time  
21 period when you used your personal phone for work versus  
22 you got a county phone?

23 A. I got my county phone I would say maybe --  
24 maybe three, four months after the incident with Babb's  
25 traffic stop.

1 Q. Okay. So you got your county phone in, let's  
2 say, April, May, June or July of 2022?

3 A. I want to say yes. I don't -- I don't recall  
4 exactly when.

5 Q. Okay. Approximate is fine. I'm just trying to  
6 get an assessment.

7 A. I would say somewhere around a few months after  
8 that.

9 Q. The summer of 2022?

10 A. Yes, I would say that's fair.

11 Q. Okay. And why didn't you have a cell phone  
12 before then?

13 A. So Sergeant Gamboa had been working on one --  
14 getting me one. Unfortunately, you know, it just took a  
15 while to get it. And it took a deputy to retire for me  
16 to get the phone. So that's how that worked.

17 Q. Okay. That's helpful.

18 Let's look at Exhibit 91. Can you identify  
19 the phone number here [REDACTED] 6104?

20 A. Let me look at my county phone. It's going to  
21 be Lieutenant Freveletti.

22 Q. Okay. Lieutenant Freveletti. You can -- here  
23 do you have a pen, do you need a pen? Can you write  
24 that on here?

25 A. Both are going to be Lieutenant Freveletti.

1 Q. Okay. Great. I know I'm testing you. Can you  
2 spell her name?

3 A. It's a lot.

4 Q. So can you tell me what's happening in this  
5 text message?

6 A. I'm asking about training.

7 Q. Okay. It doesn't -- like, is there a question  
8 before this that wasn't captured by the conversation?

9 A. I'm sorry?

10 Q. So it seems like the first message is from  
11 Lieutenant Freveletti. Was there a prior message where  
12 you messaged her about a training?

13 A. I believe so.

14 Q. Just help me understand in what's going on in  
15 this text message?

16 A. So I'm asking about going to a training class,  
17 and she sent me a training form, I guess it's like a --  
18 most of these -- they call it a gold mine meaning that  
19 it's like -- this is how you should write your training  
20 form and submit it to us.

21 Q. Okay. So she -- did she send you any examples,  
22 is that what you're saying to me?

23 A. Yes.

24 Q. And by -- filled out by Estrada?

25 A. Yes.

1 Q. Okay. Do you remember what training this was?

2 A. It's -- I believe it was another conference.

3 Q. Okay. So -- and the date on this is 1/24/2024.

4 Is that fair?

5 A. Yes.

6 Q. So some conference that you wanted to attend in  
7 2024?

8 A. Yes.

9 Q. Do you -- have you attended that conference?

10 A. No.

11 Q. What conference was it?

12 A. It's another interdiction conference.

13 Q. Can you tell me what it was?

14 A. It's basically -- they call it a national  
15 interdiction conference.

16 Q. Who puts it on?

17 A. It depends, they -- the organization's called  
18 National Interdiction -- I don't remember the full term  
19 of it. But they put on an interdiction conference  
20 somewhere in the United States and basically  
21 interdiction teams from all over the country and  
22 sometimes over the world come and they assemble and they  
23 talk about, you know, trends in their area. Same thing  
24 almost as the NBCI conference was.

25 Q. Okay. And you don't remember who put this

1 conference on?

2 A. It's -- I believe it goes by NIC.

3 Q. NIC. Okay. Did you attend that conference?

4 A. No, it hasn't happened yet.

5 Q. Do you know when it's supposed to happen?

6 A. September.

7 Q. Are you supposed to attend it?

8 A. I haven't got any information on it other than  
9 have I been approved for it or not.

10 Q. Okay. Did you submit the form that Lieutenant  
11 Freveletti was talking about here?

12 A. Yes, ma'am.

13 Q. Okay. And how long does it normally take for  
14 that form to get approved?

15 A. They say a minimum of 30 days, and I believe I  
16 submitted it probably around January/February time  
17 frame.

18 Q. Okay. And does Lieutenant Freveletti approve  
19 your training forms?

20 A. Yes. But she has -- in the conference, say,  
21 especially when it costs a little bit of money it has to  
22 get sent up to the chiefs and they have to approve the  
23 funding for it.

24 Q. So when it costs money, would it be fair to say  
25 it takes longer to get approval?

1 A. I believe so, yes.

2 Q. Okay. Let's look at P.

3 MS. HEBERT: Would you mind marking this,  
4 Mr. Windham, as Exhibit 92.

5 (Exhibit No. 92 was marked.)

6 Q. (BY MS. HEBERT) I have three. Three left.

7 MR. WINDHAM: We're going to stick to it.

8 MS. HEBERT: We have more than three. Just  
9 kidding. Sorry. They're kind of crinkled.

10 Q. (BY MS. HEBERT) My colleague is handing you  
11 what's been marked Exhibit 92. Take a second to review  
12 this if you don't mind.

13 MS. HEBERT: There's two pages.

14 MR. WINDHAM: I did that again. This has  
15 two pages.

16 Q. (BY MS. HEBERT) Let me know when you're ready.

17 A. Okay.

18 Q. Exhibit 92 is what's marked "Gereb Work Text -  
19 Conversation No. 3." I think we just identified this  
20 number as Lieutenant Freveletti; is that right?

21 A. Yes.

22 Q. Could you write Lieutenant Freveletti on that?

23 A. I'm looking at all --

24 Q. I think they're all from her.

25 A. And it's a repeat.



1 Q. It's just a repeat, right. And I think it's --  
2 I don't know, but I think it is because there were  
3 objects attached to it, so it's the way that this  
4 examiner ended up pulling it, but we don't have the  
5 objects.

6 And I'm just going to read -- the same  
7 message is repeated I think three times or four times.  
8 I'm just going to read parts of it to you and then ask  
9 questions. Is that okay?

10 A. Yes, ma'am.

11 Q. "GCSO interdiction just traffic stop a vehicle  
12 on a cold stop."

13 Did I read that first sentence right?

14 A. Yes, ma'am.

15 Q. What is GCSO?

16 A. I want to say it was referring to Guadalupe  
17 County.

18 Q. Guadalupe County Sheriff's Office interdiction,  
19 is what she's referring to?

20 A. Yeah.

21 Q. And what is a cold stop?

22 A. A cold stop is I saw the vehicle, nobody has  
23 given me any information about it. I developed, you  
24 know, my own PC. I stop the vehicle for whatever reason  
25 and, you know, this is what -- this was the result of

1 that finding.

2 Q. And the result of that finding is the next  
3 sentence "40 kg of fentanyl." Is that fair?

4 A. Yes, ma'am.

5 Q. And then I see an emoji. I'm not really sure  
6 what that expression is. How would you characterize  
7 that emotion that emoji based on what you can see?

8 A. Shock.

9 Q. Okay. So I understand lieutenant -- what's  
10 your understanding of what Lieutenant Freveletti is  
11 saying in this -- these two sentences?

12 A. This was coming our way and, you know, this  
13 county got it before us.

14 Q. Okay. And then let's read the next sentence.  
15 "He just utilizes the license plate reader system for  
16 vehicles going towards Houston and then turning back  
17 around that's typically how he gets everything."

18 Did I read that right?

19 A. Yes, ma'am.

20 Q. What did you understand Lieutenant Freveletti  
21 to be saying in that sentence?

22 A. That he used a license plate reader, and during  
23 his traffic stop, he accessed his license plate reader  
24 during the traffic stop and observed that a pattern of  
25 behavior for that vehicle.

1 Q. Okay. And do you know who the "he" that she's  
2 referring to is?

3 A. I believe the deputy that was involved in this  
4 traffic stop.

5 Q. Okay. And did you understand Lieutenant  
6 Freveletti to be telling you that you should be using  
7 the license plate reader system to identify vehicles  
8 with one day turnarounds to and from Houston?

9 A. No. She's saying that's just how he identified  
10 it. The license plate readers are a good tool to use.

11 Q. Okay. Did you have any takeaways from this  
12 message?

13 A. No.

14 Q. Have you seen these kind of messages from  
15 Lieutenant Freveletti before?

16 A. Yes.

17 Q. Okay. And what do those messages usually say?

18 A. Every so often. It's like -- it pertains to  
19 interdiction -- I think she's only sent me a handful of  
20 them and basically it's this person has gotten this out  
21 of this stop. This is what's going on there. There's a  
22 possible trend. You know, things to keep an eye out  
23 for.

24 Q. Okay. And so is she saying here keep an eye  
25 out for vehicles going toward Houston and then turning

1 back around?

2 A. No, ma'am. What she's saying is that this is  
3 possibly what is coming into our area due to this route.

4 Q. Okay. You can put that aside. Let's look at  
5 Exhibit Q. We're going to mark that 93?

6 (Exhibit No. 93 was marked.)

7 Q. (BY MS. HEBERT) This is a long series of  
8 messages, so I'm just going to ask you about some  
9 specific ones if that's okay.

10 MS. HEBERT: It's many pages, Joshua.

11 MR. WINDHAM: Is this where it ends?

12 MS. HEBERT: A message from Chris Torres is  
13 the last one. Yes, that's it. That's the last page.

14 Q. (BY MS. HEBERT) okay. Would you mind just  
15 reviewing, you don't have to read the whole thing.  
16 We're going to look at some specific messages. But does  
17 this look like a message chain that you're familiar  
18 with?

19 A. Yes, ma'am.

20 Q. Okay. Would you mind flipping to page 4. And  
21 the -- I'm going to just tell you this is Conversation  
22 No. 4 from your work phone. The top should be from  
23 Chris Torres, is the first message from Chris Torres on  
24 your page?

25 A. Yes, ma'am.

1 Q. Okay. And midway through the messages on this  
2 page, I see a message from [REDACTED] 6104.

3 Do you see that?

4 A. Yes.

5 Q. And is that Lieutenant Freveletti again?

6 A. I believe so.

7 Q. Okay. Would you write Lieutenant Freveletti  
8 there?

9 A. (Witness complies.)

10 Q. And it seems like she's asking is there anyone  
11 who does not have a county cell phone; is that right?

12 A. Yes, ma'am.

13 Q. And it looks like the person labeled Pete  
14 Gamboa responds "Interdiction doesn't." Was Sergeant  
15 Gamboa responding and saying interdiction does not have  
16 cell phones?

17 A. He was referring to me.

18 Q. Okay. But this is your work cell phone. So  
19 help me understand why he's referring to you as not  
20 having a county cell phone when this is a message on the  
21 county cell phone?

22 A. On this date, I didn't have the phone yet.

23 Q. Okay. Then how did you -- how did this phone  
24 end up on your -- how did this message chain end up on  
25 your work phone?

1           A. So there's a message chain that was -- which is  
2           an intel group and a group grid which I was later --  
3           which this phone was already added to it or I was added  
4           to it at another time.

5           Q. Okay. So at some point you got added to it and  
6           all the old messages are still there?

7           A. Still there.

8           Q. Okay. That's helpful. Page 6. Can you flip  
9           to page 6. The number at the top of that page looks  
10          like Freveletti is saying "Same staff requirement minus  
11          Investigators."

12                           Do you see that?

13          A. Yes, ma'am.

14          Q. And that looks like that's from Lieutenant  
15          Freveletti as well?

16          A. Yes, ma'am.

17          Q. Could you go down to the message that's from  
18          Sergeant Gamboa. I don't even know how to tell you,  
19          like two-thirds of the way from the bottom it starts  
20          with "all"?

21          A. "All Intel."

22          Q. Yeah. Can you read it?

23          A. Yes, ma'am. I'm sorry. "All Intel and  
24          Interdiction Officers fill out the daily with stats for  
25          tonight."

1 Q. What was Sergeant Gamboa referring to there so  
2 you understood it?

3 A. To fill out your daily sheet for whatever we  
4 did tonight.

5 Q. Okay. What's the daily sheet?

6 A. It's a daily activity report that we fill out.

7 Q. Okay. Did you do it every day when you were an  
8 interdiction officer?

9 A. Typically, yes. I would say there's days that  
10 I missed. Especially like longer days, and some -- some  
11 I'd stick to my --

12 Q. But for the most part you filled it out every  
13 day?

14 A. Yes.

15 Q. And what would you put on that sheet?

16 A. Whatever I did that day. If I did two traffic  
17 stops. Did I search the vehicle, not search the  
18 vehicle. Did give a ticket, did I give a warning. Was  
19 there arrest made. Did I seize any money, did I seize  
20 any drugs. Did I seize a vehicle, did I tow a vehicle,  
21 recover a vehicle. Estimated values, things of that  
22 nature, weights.

23 Q. Understood. Would every traffic stop that you  
24 made on a particular day in the criminal interdiction  
25 unit be on that daily staff report?

1 A. Yes, ma'am.

2 Q. I'm trying to figure out where the next one is,  
3 bear with me a second. I think that might be it.

4 Okay. I think that's it for this one. You  
5 can put that aside. Thank you.

6 I'm going to look at what exhibit -- what  
7 has previously been marked Exhibit 83. So we're going  
8 to have to go through this stack in front of me to find  
9 it. Give me a second. That's right on top. I'm going  
10 to hand you what's previously marked as Exhibit 83.

11 MS. HEBERT: If anybody needs a new copy,  
12 please let me know.

13 (Exhibit No. 83 was previously marked.)

14 MR. FRIGERIO: Just give me a second.

15 MS. HEBERT: Sure. Do you need to take a  
16 break?

17 MR. FRIGERIO: No, I need to get my copy.

18 MS. HEBERT: Oh, okay. I can give you a  
19 new one, Charles. I don't mind.

20 Q. (BY MS. HEBERT) Okay. I'm going to represent  
21 to you that this is the report that everyone's received  
22 from the cell phone examiner after you sent your cell  
23 phones in.

24 A. Yes, ma'am.

25 Q. Would you mind flipping to page 3?



1 And do you see where it says "Evidence  
2 Submitted".

3 A. Yes, ma'am.

4 Q. And the first section. Do you see your name  
5 there?

6 A. Yes, ma'am.

7 Q. And the paragraph talks about a lot of  
8 technical details. And then it gets to the most recent  
9 phone number assigned to this device was [REDACTED] 5302.

10 Do you see that?

11 A. Yes, ma'am.

12 Q. Was that your work phone number?

13 A. Yes, ma'am.

14 Q. That you received sometime in the June -- or in  
15 the summer of 2022 time frame?

16 A. Yes, ma'am.

17 Q. Okay. And you'll see that this is -- this  
18 evidence item number is given a number, CFM 3942.

19 Do you see that?

20 A. Yes, ma'am.

21 Q. Can we flip to page 6? And you'll see a page 6  
22 analysis of evidence item CFM 3942. Do you see that big  
23 dark blue box?

24 A. Yes, ma'am.

25 Q. This is the record that the forensic examiner

1 gave for that cell phone. Do you understand?

2 A. Yes, ma'am.

3 Q. Okay. And I want to look at the second line  
4 under the header "Messaging App." Do you see the header  
5 "Messaging App"?

6 A. Yes, ma'am.

7 Q. The second line says, "At time of examination  
8 message retention for iMessage was set to -- set to  
9 "Forever"."

10 Do you see that?

11 A. Yes, ma'am.

12 Q. At the time that you turned in your county  
13 phone, does that mean that the -- your iMessage settings  
14 were to keep your messages forever, to your knowledge?

15 A. I don't know anything about iPhones. I have an  
16 Android. So...

17 Q. Your personal phone is an Android?

18 A. Yes. And I try -- and when it comes to the  
19 county stuff, I try not to mess with the settings.

20 Q. Okay. So it was whatever the county setting  
21 was?

22 A. Yes, ma'am.

23 Q. Understood. And I want to look at the deleted  
24 items which is on page 7. So you'll see a blue header,  
25 "Deleted Items."

1 A. Okay.

2 Q. And I want to skip down to the second  
3 paragraph.

4 A. Okay.

5 Q. Do you see the call -- the paragraph starting  
6 the "Call Logs"?

7 A. Yes.

8 Q. I'm going read this paragraph to you.  
9 (Reading:) The call logs would have contained 2,398  
10 entries if none were deleted. At the time of  
11 examination there were 250 entries. There are no  
12 entries at all between 2/5/2022 at 02:53 and 4/23/2022  
13 at 14:46 hours. That is a total of 163 entries.

14 Do you know what's going on here?

15 A. No, ma'am.

16 Q. Do you know who had the cell phone before you?

17 A. Yes, ma'am.

18 Q. Who had the cell phone before you?

19 A. Hector Avila.

20 Q. What was Hector Avila's function?

21 A. He was part of the intel unit.

22 Q. Can we look at the next paragraph?

23 A. Yes, ma'am.

24 Q. And I'm going to look at the last sentence,

25 (Reading:) For the time period of 3/1/2022 to 5/1/2024,

1       there were 72 missing rows indicating deleted messages.

2                       Did I read that right?

3       A.   Yes, ma'am.

4       Q.   Do you know what happened there?

5       A.   No, ma'am.

6       Q.   To your knowledge, is there any way to retrieve  
7       the records on this cell phone that were potentially  
8       deleted or were missing?

9       A.   I don't know.

10       Q.   Sure. In March of 2022, you were using your  
11       personal cell phone for county use. Is that fair?

12       A.   Yes, ma'am.

13       Q.   Who was your provider in March of 2022?

14       A.   AT&T.

15       Q.   And you previously testified that you had  
16       contacted your provider, AT&T, for your phone records.  
17       Do you remember that?

18       A.   Yes, ma'am.

19       Q.   Who did you speak with?

20       A.   I believe it was on the FirstNet  
21       representative. I don't remember their name.

22       Q.   What is FirstNet?

23       A.   It's part of AT&T where it allows first  
24       responders to have access to a cell phone network during  
25       a crisis, like, say, a hurricane or stuff like that.

1 They try their best to make sure that we have access to  
2 make phone calls and stuff when needed.

3 Q. Understood. So it's like a special system that  
4 first responders get their cell phone coverage when  
5 nobody else does. Is that fair?

6 A. Yes, ma'am.

7 Q. And what was FirstNet's response?

8 A. They told me they could not retrieve the  
9 messages because it was beyond -- it was beyond the time  
10 frame that they're allowed to go back for.

11 Q. Okay.

12 A. And I think it was, like, I think it was two  
13 weeks, just past two weeks, and I asked them, there's no  
14 way. And I was -- they said -- I they think told me a  
15 subpoena.

16 Q. A subpoena?

17 A. Yeah.

18 Q. Okay. And do you know who a subpoena would  
19 have to be served on? Any idea?

20 A. I don't know.

21 Q. Sure. Okay. I'll just represent to you that  
22 Mr. Schott's stop was in March -- March 16th, 2022.  
23 Does that sound right to you?

24 A. Yes, ma'am.

25 Q. Okay. When did you learn about Mr. Schott's

1 complaint about his stop?

2 A. I believe when the Deputy Babb had advised me  
3 sometime after that.

4 Q. Okay.

5 A. He had advised me -- I don't remember exactly  
6 when. But he had told me that he had to do a report for  
7 it and I was like, okay. But I didn't -- I thought I  
8 was just supposed to do a report, too, because it's not  
9 required until -- unless we get out of the system on a  
10 traffic stop.

11 Q. Sure. And you did not do a report. Is that  
12 fair?

13 A. Yes, ma'am.

14 Q. I'm right that you did not do a --

15 A. I did not.

16 Q. Okay. And what was your understanding of what  
17 Deputy Babb was saying to you, that he had to do a  
18 report because Mr. Schott had complained?

19 A. Yes, ma'am.

20 Q. And do you know who -- who ordered Deputy Babb  
21 to do a report?

22 A. I believe Sergeant Gamboa.

23 Q. Okay. And when you learned that Mr. Schott had  
24 made a complaint, did anyone tell you to save your call  
25 logs?

1 A. No.

2 Q. Did anyone tell you to save your text messages?

3 A. No.

4 Q. Okay. When did you learn that Mr. Schott had  
5 filed a lawsuit?

6 A. When I got served a subpoena.

7 Q. Okay. To do the deposition?

8 A. Yes.

9 Q. Okay. Before that moment, I'll just -- I'll  
10 represent to you that Mr. Schott filed this lawsuit on  
11 June 1st, 2023, and you didn't get a subpoena for a  
12 deposition until well after that. Is that fair?

13 A. Yes, ma'am.

14 Q. After Mr. Schott filed the lawsuit and before  
15 you got your subpoena, did anyone from the county speak  
16 to you about saving your call logs?

17 A. No, ma'am.

18 Q. Did anyone from the county speak to you about  
19 saving your text messages?

20 A. No, ma'am.

21 Q. Okay.

22 MS. HEBERT: Let's take a little break, if  
23 that's okay with everybody, and we'll get the computer  
24 stuff set up for watching some videos. Is that okay.  
25 Ten -- five, ten minutes?

1 MR. ELLSWORTH: Yeah.

2 (Brief recess.)

3 Q. (BY MS. HEBERT) Okay, we're back on the record  
4 after a short break. I'm going to show you what is  
5 marked Exhibit 94. I'm going to hand Janalyn a lovely  
6 exhibit saving sheet marked Exhibit 94.

7 MS. HEBERT: Charles, for the record,  
8 this is BC 517.

9 (Exhibit No. 94 was marked.)

10 Q. (BY MS. HEBERT) As I mentioned at the  
11 beginning, Deputy Gereb, we're going to watch parts of  
12 the video. I'll represent to you that this is from  
13 Deputy Babb's body camera. We're starting -- we're  
14 going to start at, like, 30 minutes in. He made a  
15 traffic stop. He's going through some -- in the part  
16 you see right here he's going through some of the stuff  
17 that he found in the vehicle from the traffic stop.

18 If you want to watch the rest of it, we can  
19 take a break and you can watch the rest of it.

20 Otherwise, I'm going to start from here. We're going to  
21 start from 30 minutes and 8 seconds and we're going to  
22 go to approximately 30 minutes and 27 seconds, well  
23 maybe shorter.

24 Actually, before we get started we're  
25 paused on 30 minutes and 8 seconds. Do you see what's



1 up in the right-hand corner of the screen. It looks  
2 like Deputy Babb's dashboard -- dashboard?

3 A. Yes, ma'am.

4 Q. And I see some stickers there. What do you  
5 see?

6 A. Looks like it's a sign says got meth, a weed  
7 leaf and it's only salt officer.

8 Q. Okay. What are those stickers about?

9 A. So from what Babb explained to me that some of  
10 his trainings that he had received that there are  
11 certain things that stimulate behaviors. And, you know,  
12 these were stickers from some of the companies that  
13 he -- he had trained with and that's pretty much what  
14 it's from.

15 Q. Okay. And do you have stickers in your patrol  
16 car?

17 A. No, ma'am.

18 Q. You've never had stickers in your patrol car?

19 A. I have. But they're more from tactical --  
20 tactical companies and that's it. Nothing displaying  
21 like marijuana or anything like that.

22 Q. Okay. So what are the stickers that you have?

23 A. One of them, it said "American Savage" and it  
24 was an Indian -- Indian skull and it was with the  
25 headdress. Okay, and that was it. I think -- yeah,

1       that was it.

2           Q.   Okay.  That's the only sticker you've ever had  
3       in your vehicle?

4           A.   That was the only sticker I've had in my  
5       vehicle and that was recently.

6           Q.   Okay.

7           A.   Unfortunately, I did crash that Tahoe on my  
8       birthday, so.

9           Q.   Happy birthday.

10          A.   Yeah.  Was a great day.  But unfortunately --  
11       that was it.  But other than that I've never put  
12       stickers in my Tahoe like that.  And yeah, that's it.  
13       I've never had anything else.

14          Q.   Okay.  We're going to watch from 3:08 to 3:27.  
15                        (Video playing.)

16          Q.   (BY MS. HEBERT)  Okay.  Is that you we see  
17       there?

18          A.   Yes.

19          Q.   Okay.  And to confirm, was that Deputy Babb's  
20       voice that we heard at the beginning of the clip?

21          A.   Yes, ma'am.

22          Q.   Okay.  We're going to skip -- try to skip as  
23       much as possible.  I'm going skip to 33:12.  Okay.  I  
24       got close.  We're at 33:11.  That's as close as we get.  
25       I'm going to start at 33:11 and watch to 33 -- 33:34.

1 (Video playing.)

2 Q. (BY MS. HEBERT) Okay. We stopped at 33:35. I  
3 heard you say, "dude, I haven't been able to find  
4 nothing yet. I mean, I had a couple of searches and  
5 found nothing."

6 Did I get that right?

7 A. Yes, ma'am.

8 Q. What did you mean by that statement?

9 A. I had done a couple of traffic stops, and for  
10 whatever reason, I was able to search the vehicle but I  
11 wasn't able to -- I hadn't been finding anything.

12 Q. Okay. In the first part of that clip, we heard  
13 Deputy Babb telling you about the traffic stop he just  
14 made; is that right? I'm happy to watch it again.

15 A. Yeah, can we watch it again?

16 Q. Sure. Sure. I know it's, like, hard to keep  
17 it all in your brain. So we'll go back to 33 --

18 A. 33:08.

19 MR. WINDHAM: 11.

20 Q. (BY MS. HEBERT) Actually, we'll just, you know  
21 what, we'll just skip. I think we -- I'm trying to keep  
22 us not here forever. Let's just watch from here. We'll  
23 watch from here to 33:46. So we're watching from  
24 3:30 -- 33:35 to 33:46.

25 (Video playing.)

1 Q. (BY MS. HEBERT) Okay. So we just watched from  
2 33:35 to 33:46. Beginning part of this clip was Deputy  
3 Babb telling you about the stop that he just made?

4 A. Yes, ma'am.

5 Q. Okay. And then I heard Deputy Babb next say,  
6 "the other ones, I turn on my lights", and then he made  
7 like a swerving gesture kind of like a snake in the air  
8 with his arm. And then he made a fist gesture, "so it's  
9 never on."

10 Did you -- did you hear that?

11 I'm happy to watch it again.

12 A. I'm sorry, say that last part again.

13 Q. Sure, let's just watch it again. We'll watch  
14 from 33:35. All right. We're going to have to watch  
15 from 33:33, I guess. It won't go there. I just want  
16 you to pay attention to what Deputy Babb does with his  
17 arm and what he says there.

18 (Video playing.)

19 Q. (BY MS. HEBERT) Okay. So that last part, I  
20 heard Deputy Babb say "the other ones, I turn on my  
21 lights" and then he made a hand swerving gesture and  
22 then he made a -- and then he says "and then" and he  
23 makes a hand fist gesture and then he says, "so it's  
24 never on."

25 Did I get that right?

1 A. Yes, ma'am.

2 Q. Okay. What did you understand Deputy Babb to  
3 be talking about there?

4 A. I'm going to go -- I'm going to assume that  
5 he's talking about the traffic stop. So what he's seen  
6 and whatever his traffic violation. I haven't worked  
7 with Babb in such a long time I don't --

8 Q. Sure.

9 A. I don't remember his mannerisms anymore.

10 Q. No. It's okay. But you were -- you were here  
11 at this conversation with Deputy Babb. Is that fair?

12 A. Yes, ma'am.

13 Q. And you had spoken to him before. Is that  
14 fair?

15 A. Yes, ma'am.

16 Q. And he made a couple of hand gestures. Did  
17 you -- were you confused by what he was saying?

18 A. Well, what I interpret it as that he made  
19 traffic violations and he initiated a traffic stop.

20 Q. Okay.

21 A. That -- that was it.

22 Q. And what did he mean by "so it's never on"?

23 A. I don't recall.

24 Q. Okay. And I want you to look -- let's go back  
25 a little bit and watch this same clip again. I want you

1 to -- to describe to me what you see in terms of Deputy  
2 Babb making gestures. I'm going to skip a little bit  
3 here and try not to watch at the same time. Let's see.  
4 We're going to start from 3:39 and see if this is the  
5 right section.

6 MR. WINDHAM: 33:39.

7 Q. (BY MS. HEBERT) We're going to start from  
8 33:39 and see if this is the right section.

9 (Video playing.)

10 Q. (BY MS. HEBERT) Okay. Can you describe the  
11 hand gestures you saw Deputy Babb make there?

12 A. Looks like he's talking about how the traffic  
13 violations that he's seen. And then -- I don't  
14 understand what the fist was about.

15 Q. Okay. Could it be him pressing a button?

16 A. I'm assuming that it's his way of initiating  
17 the traffic stop.

18 Q. Okay.

19 A. Again, I don't know. I don't recall.

20 Q. And what could he -- what could it -- what --  
21 what did you understand Deputy Babb to be referring to  
22 when he said "it's never on"?

23 A. I don't know.

24 Q. Okay. But you didn't say that at the time, did  
25 you?

1 A. No.

2 Q. Okay. Let's watch from this point, which is  
3 currently stopped at 3 -- 33:47 to 34, minute 34.

4 (Video playing.)

5 Q. (BY MS. HEBERT) Okay. I heard Deputy Babb  
6 say, "I changed my view, as you can see."

7 Did you hear that?

8 A. Yes.

9 Q. What was Deputy Babb referring to?

10 A. So in some of Babb's training, he -- he looked  
11 at certain vehicles, from what I recall, and then he  
12 never really went after -- I guess you want to say  
13 vehicles that were more inner city, versus how I did  
14 things. So I looked at everybody. I pull a traffic  
15 stop, I pull a traffic stop. So Babb changed the way he  
16 did things because we started working more inner city  
17 and away from the highway. Not away from the highway  
18 but inner city around the highway.

19 We got away from more, I guess, the rural  
20 part -- more urban, and so he started knocking down cars  
21 differently.

22 Q. He started -- what was that?

23 A. Knocking down -- doing traffic stops  
24 differently. I'm sorry.

25 Q. Okay.

1 A. I say knocking down, meaning a traffic stop.

2 Q. Okay.

3 A. So he started doing traffic stops differently  
4 and changed his pattern and focused on more -- people  
5 more inner city.

6 Q. Okay. Let's watch that piece again. It was  
7 about 33:46 to 34. So we're at 33:46, I'm going to play  
8 it till 34 again.

9 (Video playing.)

10 Q. (BY MS. HEBERT) Okay. I saw Deputy Babb point  
11 at something and you turned and looked. What was he  
12 pointing at?

13 A. The vehicle.

14 Q. And what was he pointing at on the vehicle?

15 A. Just the type of vehicle it is.

16 Q. Okay. So he changed his view on the type of  
17 vehicle?

18 A. That's my understanding at the time, yes.

19 Q. The vehicle that he pulled over, is that what  
20 you're saying?

21 A. Yes.

22 Q. When he said "the old" and he pointed again,  
23 what was Deputy Babb referring to?

24 A. I don't recall.

25 Q. Okay. Let's look at Exhibit DD and watch one



1 more video. Hopefully this will be the last one. This  
2 will be marked Exhibit 95.

3 (Exhibit No. 95 was marked.)

4 Q. (BY MS. HEBERT) And I'm going to mark you a  
5 placeholder piece of paper. I'm going to skip to 4:50.

6 MR. WINDHAM: Does it have a Bates number?

7 MS. HEBERT: I'll give it to you. Hold on  
8 a second.

9 MR. WINDHAM: 10770.

10 MS. HEBERT: We'll play it from my  
11 computer. Is that okay?

12 THE WITNESS: Yes, ma'am.

13 MS. HEBERT: Why don't we go off the record  
14 for like five minutes while I plug things in. I'm going  
15 to put a speaker up so that everybody can hear better.

16 (Brief recess.)

17 Q. (BY MS. HEBERT) All right. So we had some  
18 technological issues. I'm now standing over poor Deputy  
19 Gereb's shoulder and we're going to watch on my laptop.  
20 We're going to go to 4:50 in what has been marked  
21 Exhibit 95, which is also BC 10770.

22 And I'll represent to you, Deputy Gereb,  
23 that before the -- four to five minutes before this, you  
24 arrive at a traffic stop that Deputy Babb has already  
25 made and he has found some kind of drug there.

1                   You're, again, welcome to watch this video  
2                   in its entirety. Should you want to, we can take a  
3                   break and you can watch the whole video. This one is, I  
4                   think a shorter video so if you really want to watch it,  
5                   it would be easy to do.

6                   And we're going to play to 5:13. I don't  
7                   hear any sound. Okay. No sound. Hold on. Okay. I'll  
8                   go to 4:50. Now let's try this again. We're going to  
9                   try from 4:49 and hopefully the sound will work this  
10                  time.

11                 MS. HEBERT: I don't hear anything, Josh.  
12                 We've got nothing. We've got no sound.

13                 MR. WINDHAM: Take your speaker out and try  
14                 putting it through.

15                 MS. HEBERT: I did.

16                 MR. WINDHAM: Look at me telling you things  
17                 you already know.

18                 MS. HEBERT: All right. Let's try this  
19                 again. Sorry, folks.

20                 MR. WINDHAM: I have a computer.

21                 MS. HEBERT: Technological issues. I don't  
22                 know how to fix that, Josh. Oh, I do know how to fix  
23                 it. All right. Like, third time is the charm.

24                 (Video playing.)

25                 Q. (BY MS. HEBERT) Okay. Let me try that again.

1 Again. Again. Okay. I'm going to start from 4:51 and  
2 try this again. I think we have the sound issue figured  
3 out now and play to 5:13.

4 (Video playing.)

5 Q. (BY MS. HEBERT) Okay. We just watched a clip  
6 from 4:50 to 5:13 where you're speaking with Deputy  
7 Babb.

8 Who is Veronica?

9 A. That at the time was his ex-girlfriend -- or at  
10 the time was his girlfriend, now ex-girlfriend.

11 Q. Okay. Deputy Babb was telling you, as you  
12 understood it, that he had been on the phone with  
13 Veronica. Is that fair?

14 A. Yes, ma'am.

15 Q. Okay. And Deputy Babb said that he got the  
16 driver on obstruction. Can you tell me what that means?

17 A. Usually it's some other obstruction in  
18 roadway -- highway or roadway. Either they're going too  
19 slow or they're stopped on the roadway, something of  
20 that nature, that's somehow causing a traffic hazard or  
21 violation.

22 Q. Okay. And you responded with, "I figured, and  
23 I was like I know what you did, I know what you did."  
24 What did you mean by that?

25 A. I know what he did, at the time, I knew how he

1 was working.

2 Q. Okay. What did you mean by "I know how you  
3 were working"?

4 A. On this situation, I don't recall. But I know  
5 at the time, how he -- if he saw it he's going to get  
6 them on it.

7 Q. Okay. We're going to skip ahead to another  
8 spot. A lot of what we're skipping here is, like, some  
9 searching by you and Deputy Babb and arranging to tow  
10 the vehicle as I understand it. And so we're going to  
11 skip to 15 -- 17:45. We're going to watch from 17:45 to  
12 approximately 17:57.

13 (Video playing.)

14 Q. (BY MS. HEBERT) Okay. I heard Deputy Babb say  
15 "he hates when he calls me, though. And I can hear it  
16 in his voice."

17 Did I get that right?

18 A. I believe so, yes.

19 Q. Was Deputy Babb referring to Sergeant Gamboa?

20 A. I believe so. I don't recall who was calling  
21 him. Usually Sergeant Gamboa is what we're talking  
22 about.

23 Q. Okay. And what did you understand?

24 A. Or -- or it could be one of the K-9 guys.

25 Q. Okay. What did you understand Deputy Babb to

1 be saying in the clip that we just watched?

2 A. That he called somebody, and --

3 Q. That somebody called him or he called somebody?

4 How about we rewatch it if you want?

5 A. Can we rewatch it?

6 Q. Yeah. 17:45 to 17:57.

7 All right. We're starting at 17:45 and  
8 we'll watch to 17:57 approximately.

9 (Video playing.)

10 Q. (BY MS. HEBERT) Okay. We stopped at 17:55.

11 A. That's going to be -- if he's saying what he  
12 got, that's going to be Sergeant Gamboa.

13 Q. Okay. So is Deputy Babb referring to, as you  
14 stood it, Sergeant Gamboa calling him?

15 A. Yes, ma'am.

16 Q. And were you understanding Deputy Babb to be  
17 saying Sergeant Gamboa was getting excited on the phone?

18 A. I believe so. He's just asking him about what  
19 he has.

20 Q. Sure. We're going to watch from wherever we  
21 are, 17:55 to 18:13. So we're at 17:55, going to 18:13.

22 (Video playing.)

23 Q. (BY MS. HEBERT) Okay. I heard you say "he  
24 knows the reality that we're going to run into more --  
25 we're going to run more into this shit than bigger

1 shit."

2 Did I get that right?

3 A. Yes, ma'am.

4 Q. What were you referring to?

5 A. So typically in my experience and what I've  
6 done with interdiction is the dope or the narcotics or  
7 contraband that we have gotten is usually a lot smaller  
8 than or, I could say, street level narcotics versus, you  
9 see smuggler type. Mostly because of the area or the  
10 type of area that Bexar County is. Bexar County is a  
11 hub for narcotics and smuggling and trafficking and all  
12 that stuff. But the issue that we run into is that  
13 there's so many highways, a lot of the main highways  
14 through south Texas run through San Antonio and Bexar  
15 County.

16 We have two major loops. We have two major  
17 back -- we have tons of major back roads, county roads,  
18 farm roads. So it is -- you can be on one highway one  
19 day and not catch anything but your smuggler is going  
20 through a back road two miles away from you.

21 Q. Okay.

22 A. So it can -- so a lot of stuff we do catch, we  
23 catch -- yes, we do have to arrest them for. But it's  
24 not always the bigger item that we want.

25 Q. Okay. So unpacking all of that, would it be

1 fair to say that most times that you searched and  
2 discovered narcotics it was relatively small amounts?

3 A. Yes, ma'am.

4 Q. And the "he" that you were talking about here,  
5 was that Sergeant -- Sergeant Gamboa again?

6 A. Yes, ma'am.

7 Q. Okay. We're going to watch the same clip  
8 again. Try to watch 17:57 to 18:13, but I want you to  
9 pay attention to what Deputy Babb says. And it's a  
10 little hard with the wind and it being your body camera.  
11 But we'll just see what we can do. Okay. I'm going to  
12 play from 17:58 forward.

13 (Video playing.)

14 Q. (BY MS. HEBERT) So -- we'll replay this little  
15 last bit so you can hear the whole thing a little more  
16 again. We'll play it just 8:07 forward -- 18:07.  
17 Excuse me.

18 (Video playing.)

19 Q. (BY MS. HEBERT) Okay. I heard Deputy Babb say  
20 "But we are hunting that way right now, and that's how  
21 I've been hunting."

22 Did I get that right?

23 A. Yes, ma'am.

24 Q. What did you understand Deputy Babb to mean by  
25 hunting?

1           A. So hunting is just -- it's a slang term that we  
2       have used for, you know, going out being proactive  
3       policing, looking for people involved in criminal  
4       activity, you know, traffic stops, field contacts,  
5       suspicious activity that we're -- we're just coming up  
6       upon. So it could be any form of proactive policing.

7           Q. Cool. Okay. We're going to watch from  
8       wherever we are 18 -- 18:16 to 18:23. We may have to go  
9       back.

10                       (Video playing.)

11           Q. (BY MS. HEBERT) Okay. I heard you say "That's  
12       why I've been going around on highways, man."

13                       Did I get that right?

14           A. Yes, ma'am.

15           Q. What did you mean by that?

16           A. Usually I'm just going up and down the highway,  
17       I'm going to access road and going to highways. If  
18       there's an access road I'll go and just make my rounds,  
19       circles, and see -- and see if I can catch anybody  
20       that's involved in any type of criminal activity.

21           Q. Is that part of what you were referring to as  
22       hunting?

23           A. Yes, ma'am.

24           Q. Okay. We're going to skip a little ahead. Try  
25       to save us some time. We're going to skip to 19:20.



1 We're going to watch to 19:29, just a couple seconds.

2 (Video playing.)

3 Q. (BY MS. HEBERT) Okay. We actually stopped at  
4 19:33. Sorry. I was a little slow. I heard Deputy  
5 Babb say, "I'm glad I got something after all those  
6 stops."

7 Did I get that right?

8 A. Yes, ma'am.

9 Q. And then I heard Deputy Babb say something,  
10 like, "I just got done -- I just got done telling  
11 Veronica that I must suck because I've done, like, nine  
12 stops."

13 Did I get that right?

14 A. Yes, ma'am.

15 Q. Was Deputy Babb saying he had done at least  
16 nine stops before the current one and found nothing?

17 A. Yes, ma'am.

18 Q. Okay. I think we're done with that video, and  
19 I can stop standing over your shoulder. Is that okay?

20 A. Yes, ma'am.

21 Q. Okay. Pass that back over here.

22 Okay. Thank you, Deputy Gereb. At this  
23 time, we're going to pass the witness and hold the  
24 deposition open given that we still don't have all the  
25 documents. We may have to talk to you again, I'm sorry

1 to say that. But we'll pass the witness for now.

2 MR. ELLSWORTH: We'll reserve our  
3 questions.

4 MR. FRIGERIO: We'll reserve our questions  
5 as well.

6 (Deposition concluded.)

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WITNESS NAME: JOE GEREB                      DATE: 08/01/2024

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REPORTER'S CERTIFICATION

DEPOSITION OF JOE GEREB

TAKEN AUGUST 1, 2024

I, Janalyn Elkins, Certified Shorthand  
Reporter in and for the State of Texas, hereby certify  
to the following:

That the witness, JOE GEREB, was duly sworn by  
the officer and that the transcript of the oral  
deposition is a true record of the testimony given by  
the witness;

That the original deposition was delivered to  
CHRISTIE HEBERT;

That a copy of this certificate was served on  
all parties and/or the witness shown herein on  
\_\_\_\_\_.

I further certify that pursuant to FRCP No.  
30(f)(i) that the signature of the deponent was  
requested by the deponent or a party before the  
completion of the deposition and that the signature is  
to be returned within 30 days from date of receipt of  
the transcript. If returned, the attached Changes and  
Signature Page contains any changes and the reasons  
therefor.

I further certify that I am neither counsel  
for, related to, nor employed by any of the parties in  
the action in which this proceeding was taken, and

1 further that I am not financially or otherwise  
2 interested in the outcome of the action.

3 Certified to by me this 18th day of August  
4 2024.

5   
6

JANALYN ELKINS

7 Texas CSR 3631

Expiration Date 1/31/2025

8 Veritext Legal Solutions

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1 Charles S. Frigerio, Esq.

2 Charlie@frigeriolawfirm.com

3 August 18, 2024

4 RE: Schott, Alek v. Babb, Joel Et Al

5 8/1/2024, Deputy Joe Gereb (#6725911)

6 The above-referenced transcript is available for  
7 review.

8 Within the applicable timeframe, the witness should  
9 read the testimony to verify its accuracy. If there are  
10 any changes, the witness should note those with the  
11 reason, on the attached Errata Sheet.

12 The witness should sign the Acknowledgment of  
13 Deponent and Errata and return to the deposing attorney.  
14 Copies should be sent to all counsel, and to Veritext at  
15 cs-midatlantic@veritext.com.

16 Return completed errata within 30 days from  
17 receipt of testimony.

18 If the witness fails to do so within the time  
19 allotted, the transcript may be used as if signed.

20  
21  
22 Yours,

23 Veritext Legal Solutions  
24  
25

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[watched - yeah]

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

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